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January 27, 2020

R17421-7

Mr. Bob Bernoteit  
Illinois Environmental Protection Agency - Bureau of Air  
1021 North Grand Avenue East  
Springfield, IL 62702

**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility  
General III, LLC – 11600 South Burley - Chicago, Illinois  
Site ID No. 031600SFX**

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JAN 28 2020

Environmental Protection Agency  
BUREAU OF AIR

Dear Mr. Bernoteit:

Please find attached an updated copy of facility emission estimates for the above referenced construction permit application. This updated Section 3.0 Facility Emissions Estimates of the original GIII construction permit application has been prepared to include the following updates.

- Incorporation of the November 2019 RTO/Scrubber Emissions Test results documented in the January 16, 2020 RTO/Scrubber Emissions Test report (provided as Appendix D, attached to these updated emission estimates).
- Addition of six supplemental conveyors for the Ferrous material handling system and six supplemental conveyors for the Non-Ferrous material handling system. These supplemental conveyors have been added to meet the potential need for a limited number of additional conveyors beyond the number of conveyors identified in the original system designs.
- Incorporation of updated metal emission rates identified in a recent air dispersion modeling assessment provided to IEPA. These updated values are used to update facility-wide metal HAP emissions.

If you have any questions or need any additional information, please don't hesitate to contact us at 630-393-9000.

Yours very truly,  
**RK & Associates**

cc: Mr. Jim Kallas – General III, LLC – Chicago, Illinois (via e-mail)

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**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility  
General III, LLC - Chicago, Illinois**

**January 27, 2020**

**R17421-7**

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### 3.0 FACILITY EMISSIONS ESTIMATES – Updated January 22, 2020

#### Updated Information

This updated Section 3.0 Facility Emissions Estimates of the original GIII construction permit application has been prepared to include the following updates.

- Incorporation of the November 2019 RTO/Scrubber Emissions Test results documented in the January 16, 2020 RTO/Scrubber Emissions Test report (provided as Appendix D, attached to these updated emission estimates).
- Addition of six supplemental conveyors for the Ferrous material handling system and six supplemental conveyors for the Non-Ferrous material handling system. These supplemental conveyors have been added to meet the potential need for a limited number of additional conveyors beyond the number of conveyors identified in the original system designs.
- Incorporation of updated metal emission rates identified in a recent air dispersion modeling assessment provided to IEPA. These updated values are used to estimate of facility-wide metal HAP emissions.

As described in this application, GIII will install a state-of-the-art emissions control system on the hammermill shredder. The shredder will be located inside of a partial enclosure with walls and a vented metal roof to help contain debris and particulate matter (PM) generated during the shredding process. The shredder will be equipped with an integral water injection system to minimize the potential for fires and deflagrations inside the shredder. As established in previous permits, the water injection system is integral to the process and is not a pollution control device for the purposes of this permit application.

GIII has taken other significant measures to limit emissions, and potential impacts, from this facility, including:

- GIII's proposed facility will be a state-of-the-art recycling facility located in the heart of an industrial district well-buffered from residential properties with at least 1,500 feet between the facility property line and the nearest residential area.
- Approximately 95% of interior plant roadways are paved with concrete or asphalt. The remaining approximately 5% of interior plant roadways consist of crushed slag or similar materials and are only lightly traveled.
- The shredder will be one of the first shredders in the nation to install a comprehensive emissions capture and control system to control VOM, PM, and HAPs.

- Many of the conveyors in the Non-Ferrous Material Processing System will be equipped with covers to prevent windblown emissions.
- The majority of the fines processing equipment is located within a building and controlled with dust collectors.
- GIII will implement a fugitive operating program that will require periodic watering and sweeping of traffic areas to minimize fugitive particulate emissions.
- GIII will use a network of dust boss water atomizing cannons to apply water into the ambient air to wet suspended particulate to increase settling.
- The facility has received all necessary zoning approvals from the City of Chicago.

Emission units identified in the application include:

- Shredder controlled by cyclone, roll-media filter, RTO, and packed tower scrubber;
- Ferrous Material Processing System;
- Non-Ferrous Material Processing System;
  - Dust Collector for control of select exhaust streams from the fines handling building;
- Stockpiles (fugitive emissions);
- Paved and Unpaved Roads (fugitive emissions); and
- Miscellaneous Natural Gas Fired Environmental Heaters (exempt from permitting).

Each of the above emission units are discussed in the sections below and emissions for each are summarized in Tables 3-1A through 3-1E and Tables 3-2 through 3-6. Facility-wide criteria and HAP pollutant emissions are summarized in Tables 3-7 and 3-8. The emissions estimates presented in this application demonstrate that the proposed Facility is a minor source with respect to new source review, and Title V permitting requirements and is also a minor source of HAP emissions.

### **3.1 Shredder Emissions Controlled by Cyclone, Roll-Media Filter, Regenerative Thermal Oxidizer, and Packed Tower Scrubber**

#### **Updated Information**

As described herein, emission estimates for the proposed Shredder have been updated to incorporate the results from the November 2019 emissions testing performed on the RTO/Scrubber at GII that will be relocated to GIII as part of this project.

This section provides shredder emissions estimates for captured/controlled emissions routed through the proposed emission control system consisting of a cyclone, roll-media filter, RTO, and packed tower scrubber.

GIII will install a new shredder at the proposed facility and will relocate the existing cyclone, roll-media filter, RTO and packed tower scrubber from the existing GII facility to the proposed facility. The raw scrap feed stream received at the existing GII facility is essentially the same feed stream that will be received at GIII's proposed facility. For these reasons, for the purposes of this application, the emission data from the existing shredder and emission control system at the GII facility is assumed to reasonably represent the anticipated emissions from GIII's new shredder at the proposed facility.

The shredder will be located inside of a partial enclosure with walls and a vented metal roof to help contain debris and particulate matter (PM) generated during the shredding process. The shredder will be equipped with an integral water injection system to minimize the potential for fires and deflagrations inside the shredder.

VOM emission estimates presented herein assume an RTO control efficiency of 98% based on the design of the RTO. The RTO/Scrubber currently in use at GII, will be moved to GIII. Compliance demonstration testing of the existing RTO/Scrubber at GII was completed on November 14, 15, and 18, 2019.

The captured shredder emissions identified in this application are based on demonstrated emission factors in units of pounds-of-emissions per ton of gross feed to the shredder derived from November 2019 emissions testing of the existing GII RTO/Scrubber.

The emissions estimates presented in this updated section are calculated using demonstrated emission factors and proposed maximum monthly and annual material throughput rates. This construction permit application does not rely on operating hours to estimate monthly or annual emissions; therefore, no operating hour limits are requested.

This construction permit application requests an annual shredder throughput limit of 1,000,000 tons/year and a monthly throughput limit of 10% of the annual, or 100,000 tons/month.

Visual observations of the shredder capture hood by USEPA representatives during the November 2019 emissions testing indicated that the hood over the shredder achieved an estimated capture efficiency of greater than >90%. The nature of the shredding operation and related safety concerns prevents a direct measurement of emissions capture efficiency using a permanent or temporary total enclosure; therefore, the GII RTO/Scrubber compliance demonstration testing did not require capture efficiency testing.

The Shredder PM/PM<sub>10</sub>, metals, HCl , HF and total HAPs in this application includes a safety factor applied to the product of November 2019 emission factors multiplied by the maximum projected monthly and annual material throughputs. No safety factor is applied to VOM because permitted emissions are calculated using 98% VOM removal efficiency whereas the demonstrated VOM removal efficiency was 99%.

### **3.1.1 Shredder VOM and CO Emissions**

For the purposes of these emission calculations, it is assumed that THC, as referenced in November 2019 RTO/Scrubber emissions testing report (see Appendix D) is equivalent to VOM.

The proposed VOM and CO emission limits for the proposed Shredder, controlled by a cyclone, roll-media filter, RTO and packed tower scrubber, are presented in Table 3-1A.

The uncontrolled VOM emission factor, was adjusted to subtract methane and ethane pursuant to USEPA Method 25A. It should be noted that the November 2019 VOM emissions testing was performed at a significantly elevated shredder feed rate (444 tph) and End of Live Vehicle (ELV) feed rate (50.9%) in order to maximize VOM loading to the RTO. These operating rates yielded an uncontrolled VOM emission factor of 0.5119 pounds of VOM per ton of gross shredder feed (see test report in Appendix D).

The monthly Shredder RTO/Scrubber VOM emissions rate is calculated using the following equation:

$$\begin{array}{l}
 100,000 \frac{\text{ton}}{\text{month}} \times 0.5119 \frac{\text{lb VOM}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times (1 - 0.98) = 0.51 \frac{\text{ton}}{\text{month}}
 \\[10pt]
 \begin{array}{lllll}
 \text{maximum} & \text{adjusted VOM} & \text{convert} & \text{minimum} & \text{monthly} \\
 \text{monthly} & \text{emission factor} & \text{lb/ton} & \text{VOM} & \text{VOM} \\
 \text{shredder} & \text{(captured emissions)} & & \text{removal} & \text{emissions} \\
 \text{throughput} & \text{November 2019} & & \text{efficiency} &
 \end{array}
 \end{array}$$

The annual Shredder RTO/Scrubber VOM emissions rate is calculated using the following equation:

$$1,000,000 \frac{\text{ton}}{\text{year}} \times 0.5119 \frac{\text{lb VOM}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times (1 - 0.98) = 5.12 \frac{\text{tons}}{\text{year}}$$

maximum annual shredder throughput	adjusted VOM emission factor (captured emissions) November 2019	convert lbs to tons	minimum RTO VOM removal efficiency	annual VOM emissions
------------------------------------	--	---------------------	------------------------------------	----------------------

CO emissions are estimated by multiplying the proposed monthly and annual shredder material throughput rates by the CO emission factor measured during the November 2019 RTO/Shredder Emissions Test and the application of a safety factor.

The monthly Shredder RTO/Shredder CO emissions rate is calculated using the following equation:

$$100,000 \frac{\text{ton}}{\text{month}} \times 0.0219 \frac{\text{lb CO}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times 2.00 = 1.29 \frac{\text{ton}}{\text{month}}$$

maximum monthly shredder throughput	CO emission factor (captured emissions) November 2019	convert lb to tons	Safety Factor	monthly CO emissions
-------------------------------------	--	--------------------	---------------	----------------------

The annual Shredder RTO/Scrubber CO emissions rate is calculated using the following equation:

$$1,000,000 \frac{\text{ton}}{\text{year}} \times 0.0219 \frac{\text{lb CO}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times 2.0 = 12.86 \frac{\text{tons}}{\text{year}}$$

maximum annual shredder throughput	CO emission factor (captured emissions) November 2019	convert lbs to tons	safety factor	annual CO emissions
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### **3.1.2 Shredder Particulate Emissions**

The estimated shredder PM/PM<sub>10</sub> emissions are presented in Table 3-1B. A PM/PM<sub>10</sub> emission factor was developed from filterable PM emissions testing conducted on November 18, 2019, performed in the scrubber exhaust stack. The emissions test report for this testing event is presented in Appendix D of this application.

The demonstrated PM/PM<sub>10</sub> emission factor from the November 18, 2019, emissions test was 0.0032 lb/ton of gross shredder feed (see Appendix D).

For the purposes of this permit application, the filterable PM/PM<sub>10</sub> emission factor of 0.0047 lb/ton from the original application is used herein to conservatively calculate the proposed filterable PM/PM<sub>10</sub> emissions limits. For the purposes of this application, filterable PM is conservatively assumed to be PM<sub>10</sub>.

A safety factor of 4.0 (consistent with the original permit application) has also been included in the estimated PM/PM<sub>10</sub> emission calculations below.

$$100,000 \frac{\text{ton}}{\text{month}} \times 0.0047 \frac{\text{lb filterable PM/PM10}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times 4.00 = 0.94 \frac{\text{tons}}{\text{month}}$$

maximum monthly shredder throughput	filterable PM/PM <sub>10</sub> emission factor (captured emissions) from original application	Convert lbs to tons	safety factor	monthly filterable PM/PM <sub>10</sub> emissions
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The annual shredder PM/PM<sub>10</sub> emissions limit (measured in the scrubber discharge stack) is calculated using the following equation:

$$1,000,000 \frac{\text{ton}}{\text{year}} \times 0.0047 \frac{\text{lb filterable PM/PM10}}{\text{ton shredder feed}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \times 4.00 = 9.40 \frac{\text{tons}}{\text{year}}$$

maximum annual shredder throughput	filterable PM/PM <sub>10</sub> emission factor (captured emissions) from original application	convert lbs to tons	safety factor	annual filterable PM/PM <sub>10</sub> emissions
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### 3.1.3 Shredder Hazardous Air Pollutant Emissions

Shredder HAP emissions are summarized in Table 3-1C below. HAP emissions estimates are provided for captured HAP emissions emitted through the RTO/Scrubber stack. Proposed metal HAP and inorganic acid HAPs are based on metals and HCl/HF emission testing performed on November 14, 2019. Organic HAP emissions are estimated based on uncontrolled organic compound emission rates, identified in the Institute of Scrap Recycling Industry, Inc. (ISRI) Title V Applicability Workbook, Table D-11F (Appendix C of the original construction permit application) and adjusted for 98% removal efficiency in the RTO.

For the purposes of this permit application, a safety factor of 4.0 has been applied to the November 2019 measured emission factors for metal HAPs, HCl and HF (consistent with the PM/PM<sub>10</sub> safety factor) and a safety factor of 2.0 been applied to organic HAPs.

Shredder metal HAP, organic HAP, and inorganic acid HAP emissions are summarized in Table 3-1C.

### **3.1.4 Shredder RTO Natural Gas Combustion Emissions**

The estimated shredder RTO natural gas combustion emissions are presented in Table 3-1D. Emissions are calculated using a maximum RTO natural gas firing rate of 15 MMBtu/hr, a natural gas higher heating value (HHV) of 1,020 Btu/scf, and standard USEPA natural gas emission factors from AP-42; Chapter 1.4; Tables 1.4-1 and 1.4-2.

Natural gas combustion emission estimates are presented for criteria pollutants, Greenhouse Gases (GHG), and metal and organic HAPs.

### **3.1.5 Shredder Emissions Summary**

Table 3-1E presents a summary of total estimated shredder emissions controlled by the cyclone, roll-media filter, RTO and packed tower scrubber. The values identified in Table 3-1E identify the updated emissions limits and shredder throughput limits requested in this permit application. The proposed emission limits are in units of tons/month and tons/year and correspond to shredder gross feed rates of 100,000 tons/month and 1,000,000 tons/year.

The updated emissions information in this submittal is limited to the addition of six supplemental conveyor transfer points so up to six additional transfer points can be added during construction without requiring revision of the construction permit.

## **3.2 Ferrous Material Processing System Emissions**

Emissions from the Ferrous Material Processing System include PM, PM<sub>10</sub>, PM<sub>2.5</sub> and metal HAPs. There is no combustion or high temperature processing performed, so emissions of VOM and other products of combustion are not anticipated.

### **Updated Information**

As described herein, particulate emissions from the Ferrous Material Processing System have been increased slightly by the addition of six supplemental material transfer points. Including these 'extra' material transfer points will allow the addition of up to six additional transfer points (as may be needed) during construction of this system without requiring a modification of the construction permit issued for this project.

Updated estimates of metal HAP emissions from the Ferrous Material Processing System are also incorporated herein.

### **3.2.1 Particulate Emissions**

A review of AP-42 emission factors did not identify any published emission factors for processing shredded scrap metal or ASR using feed hoppers, conveyors, magnetic separators, screens, vibratory feed tables, eddy current separators, wind sifters, induction sorters, polishers, Air Vibe separators, or material transfer to stockpiles or storage containers. RKA is also not aware of any other source of published emission factors for this equipment processing shredded scrap metal or ASR.

In the *Institute of Scrap Recycling Industries (ISRI) Title V Applicability Workbook (1996)*, Footnote 1 on Table D-9, states that;

*"Emission factors applicable to conveyor transfer points for scrap in feed material or products are not available. A conservative estimate of PM<sub>10</sub> emission scan be made using emission factors derived from the handling of crushed stone products. The factors in this table were adapted from AP-42, Crushed Stone Processing, Section 11.19.2, Table 11.19.2-2 for uncontrolled and controlled transfer points."*

The AP-42 emission factors for crushed stone (Section 11.19.2; Table 11.19.2.2) have been uniformly adopted by the metal recycling industry as evidenced by their use in numerous permit applications for metal recycling facilities and have been accepted by IEPA and other state regulatory agencies throughout the United States.

ASR separation processes include only one small low speed high torque shredder used for size reduction of clean metal. All other ASR equipment is designed for material separation. This fact limits the potential generation of total suspended particulate matter (TSP) to only the fines present in the ASR being processed. Based on the above, the application of AP-42 particulate matter emission factors for crushed stone processing to ASR processing is likely to result in estimated emissions that are greater than actual emissions from ASR separation processes.

The following table identifies emission factors from AP-42, Table 11.19.2-2 that are typically used in metal recycling emission calculations. The identifiers in the first column of the table are used in Tables 3-2 and 3-3 to document the specific emission factors used to estimate emissions for each piece of equipment or operation.

**Particulate Emission Factors from AP 42; Table 11.19.2-2 Crushed Stone Processing (8/2004) Used in  
Estimating PM Emissions in Scrap Metal Material Handling and ASR Separation Operations.**

Identifier Used in Tables 2 & 3	Equipment	Material	Uncontrolled			Controlled <sup>1</sup>		
			PM lb/ton	PM10 lb/ton	PM2.5 lb/ton	PM lb/ton	PM10 lb/ton	PM2.5 lb/ton
A	Conveyor Transfer Point	Crushed Stone	0.0030	0.0011	0.000167 <sup>2</sup>	0.00014	0.000046	0.000013
B	Screening	Crushed Stone	0.0250	0.0087	0.001317 <sup>2</sup>	0.00220	0.000740	0.000050
C	Truck loading	Fragmented Stone	0.000033 <sup>3</sup>	0.000016	0.000002 <sup>2</sup>			
D	Truck Loading	Crushed Stone	0.000204 <sup>3</sup>	0.00010	0.000015 <sup>2</sup>			

\* 1. Use controlled emission factors when the moisture content of the materials being processed are greater than 1.5% by weight.

\* 2. Where PM2.5 emission factors are not provided in AP-42, 11-19.2-2, a ratio of aerodynamic particle size multipliers from AP-42, 13.2.4 are used to estimate PM2.5 emission factors. PM2.5 EF = (PM10 EF/.035) x .0053.

Aerodynamic Particle sizes from AP-42, 13.2.4				
<30 um	<15 um	<10 um	<5 um	<2.5 um
0.74	0.48	0.35	0.2	0.053

\* 3. PM emissions estimated as % of PM10 pursuant to Appendix A of SCAQMD Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

Particulate emissions from the Ferrous Material Processing System are generated from material transfer points and material drops (dropping materials onto stockpiles).

Material transfer emissions are calculated by applying selected PM, PM<sub>10</sub> and PM<sub>2.5</sub> emission factors, in units of pounds of particulate matter per ton of material processed, to the projected material throughput rates (tons per hour and tons per year) at each material transfer point. Material transfer points include the points at which material is transferred from one device to another, such as conveyor to conveyer transfers, conveyor to equipment transfers, and equipment to conveyor transfers. Material throughput rates at each transfer point have been estimated by the equipment supplier.

Material drop emissions are calculated using the material drop equation from AP-42 Section 13.2.4.3 for all locations where material is dropped from a conveyor onto a stockpile or into a container.

$$E = k (0.0032) \times \frac{(U/5)^{1.3}}{(M/2)^{1.4}}$$

E = emission factor (lb/ton of material dropped)

k = particle size multiplier (dimensionless)

U = mean wind speed

<https://www.timeanddate.com/weather/usa/chicago/climate>

M = material moisture content (%)

U = 9.0 mph - annual average wind speed for Chicago (Midway Airport)

K = 0.74 PM - AP-42, Section 13.2.4, for particle size < 30 um

0.35 PM - AP-42, Section 13.2.4, for particle size < 10 um

0.053 PM - AP-42, Section 13.2.4, for particle size < 2.5 um

M = 1.5 % for light materials - AP-42, Table 13.2.4-1 for crushed limestone - (conservative)

The mean wind speed is annual average wind speed recorded at Midway Airport in Chicago, Illinois. Material discharged from the shredder is sprayed by water due the water injection system. The moisture content of material is conservatively assumed to be 1.5% for most applications (unless otherwise specified in table footnotes) because this is the moisture content that triggers the use of controlled emission factors for material transfer points in AP-42, Section 11.19.2 (Crushed Stone Processing).

Table 3-2 presents a summary of estimated PM/PM<sub>10</sub>/PM<sub>2.5</sub> from the Ferrous Material Processing System and has been updated to has six supplemental material transfer points.

### **3.2.2 Metal HAP Emissions**

Detailed metal and metal HAP emissions from the Ferrous Material Processing, Non-Ferrous Material Processing, Stockpile operations, and fugitive road dust were estimated using metals analyses data from samples of material deposition collected from GII. The results of the GII metals analyses were applied to emission units and activities at GIII that correspond to the location of the GII samples. The following table summarizes the results of the metals analyses from GII samples and describes how these results were applied to GIII emission units and activities.

For the purpose of modeling potential off site metal impacts, the Ferrous Material Processing System was divided into several volume sources. Particulate emissions from each volume source were assigned sample results from the GII material deposition sample that represents the emission unit or activity in each volume source.

**Summary of Metal Concentrations in Material Deposition<sup>1</sup> at GII**

HAP	Metals (Method 29)	Material Deposition Samples Collected from GII				
		Ferrous Roadway mg/kg	ASR Roadway mg/kg	General Roadway mg/kg	Ferrous Transfer mg/kg	Non-Ferrous Transfer mg/kg
Y	Lead	763	1,610	525	4,230	4,720
Y	Manganese	960	1,030	729	2,210	1,760
Y	Mercury	1.77	6.95	2.22	18.8	9.34
Y	Nickel	125	463	106	304	311
Y	Antimony	< 1.23	< 1.22	< 1.16	< 1.17	< 1.21
Y	Arsenic	2.28	1.75	2.70	2.75	4.51
Y	Beryllium	< 5.90	< 1.30	< 5.50	< 1.17	< 1.21
Y	Cadmium	9.63	18.4	5.42	47.6	34.6
Y	Chromium	220	991	173	402	425
Y	Cobalt	15.7	38.5	10.7	52.0	55.8
Y	Phosphorus	598	561	270	833	934
Y	Selenium	< 1.23	< 1.22	< 1.16	< 1.17	< 1.21
N	Zinc	5,470	13,300	3,080	37,300	34,000
N	Barium	388	673	232	984	684
N	Copper	1,110	1,080	841	2,100	1,650
N	Silver	< 12.3	< 12.2	< 11.6	< 11.7	< 12.1
N	Thallium	< 1.23	< 1.22	< 1.16	< 1.17	< 1.21

1. Bulk material samples from designated areas were transported to Environmental Monitoring and Technologies, Inc. (EMT) and sieved to remove oversized material. The resulting materials were analyzed for metals using the analytical methods identified in USEPA Method 29 (Metals Emissions from Stationary Sources).

GII Material Deposition Sample Name	Sample Description and Application of Results to GIII Emission Units and Activities
Ferrous Roadway	Sample collected at GII from the vehicle roadway adjacent to the shredded ferrous metal stockpile. Sample results represent anticipated metals content of fugitive particulate emissions from vehicular traffic near the shredded ferrous material stockpiles at GIII.
ASR Roadway	Sample collected at GII from the vehicle roadway adjacent to the ASR handling and stockpile area. Sample results represent anticipated metals content of fugitive particulate emissions from vehicular traffic near the bulk ASR handling and ASR stockpile areas at GIII.

GII Material Deposition Sample Name	Sample Description and Application of Results to GIII Emission Units and Activities
General Roadway	Sample collected from the entrance to GII. Sample results represent anticipated metals content of fugitive particulate emissions from vehicular traffic between the facility entrance gate and the raw scrap unloading area at GIII.
Ferrous Transfer	Sample collected at GII from the pavement adjacent to ferrous material transfer conveyors. Sample results represent anticipated metals content of particulate emissions from the Ferrous Material Processing System from the outlet of the shredder to the ferrous material stockpiles and barge loading area at GIII.
Non-Ferrous Transfer	Sample collected at GII from fines deposited on horizontal surfaces (i.e. beams, pipes, etc.) inside the ASR processing building. Sample results represent anticipated metals content of particulate emissions from the Non-Ferrous Processing System at GIII.

The summary of facility-wide HAP emissions presented in Table 3-8 identifies total metal HAP emissions from the Ferrous Material Processing System.

### 3.3 Non-Ferrous Material Processing System Emissions

#### Updated Information

Particulate emissions from the Non-Ferrous Material Processing System have been increased slightly by the addition of six supplemental material transfer points. Including these 'extra' material transfer points will allow the addition of up to six additional transfer points (as may be needed) during construction of this system without requiring a modification of the construction permit issued for this project.

Updated estimates of metal HAP emissions from the Ferrous Material Processing System are also incorporated herein.

Emissions from the Non-Ferrous Material Processing System include PM, PM<sub>10</sub>, PM<sub>2.5</sub> and metal HAPs. There is no combustion or high temperature processing performed, so emissions of VOM and other products of combustion are not anticipated.

#### 3.3.1 Particulate Emissions

Particulate emissions from the Non-Ferrous Material Processing System are generated from material transfer points, screening, truck loading, and material drops.

Material transfer emissions are calculated by applying selected PM, PM<sub>10</sub> and PM<sub>2.5</sub> emission factors in units of pounds of particulate matter per ton of material processed, to the projected material throughput rates (tons per hour and tons per year) at each material transfer point. Material transfer points include the points at which material is transferred from one device to another, such as conveyor to conveyer transfers, conveyor to equipment transfers and equipment to conveyor transfers. Material throughput rates at each transfer point have been estimated by the applicant and the supplier.

Truck loading emissions are calculated by applying selected PM, PM<sub>10</sub> and PM<sub>2.5</sub> emission factors in units of pounds of particulate matter per ton of material loaded, to the projected truck loading rates (tons per hour and tons per year).

Material drop emissions are calculated using the material drop equation from AP-42 Section 13.2.4.3 (see Section 3.2 above) for all locations where material is dropped from a conveyor onto a stockpile or into a container.

Equipment located in the Fines Building are controlled by one of four identical dust collectors. Each dust collector has a design flow rate of 12,000 cfm. Three of the dust collectors (DC-02, DC-03 and DC-04) will discharge treated air back into the building and therefore, have no emissions and are not emission units with respect to permitting requirements.

One of the dust collectors (DC-01) does vent to the outside atmosphere and its emissions represent emissions from all of the equipment located inside of the fines processing building. Particulate emissions from the dust collector are calculated by multiplying the design air flow rate by a clean side particulate concentration of 0.005 gr/dscf. The result of this calculation is shown on Table 3-3.

Table 3-3 presents a summary of estimated PM/PM<sub>10</sub>/PM<sub>2.5</sub> from the Non-Ferrous Material Processing System. This table has been updated to include six supplemental material transfer points.

### **3.3.2 Metal HAP Emissions**

As described in Section 3.2.2 above, detailed metal and metal HAP emissions from the Ferrous Material Processing, Non-Ferrous Material Processing, Stockpile operations, and fugitive road dust were estimated using metals analyses data from samples of material deposition collected from GII. The results of the GII metals analyses were applied to emission units and activities at GIII that correspond to the location of the GII samples. Section 3.2.2 above summarizes the results of the metals analyses from GII samples and describes how these results were applied to GIII emission units and activities.

For the purpose of modeling potential off site metal impacts, the Non-Ferrous Material Processing System was divided into several volume sources. Particulate emissions from each volume source were assigned

sample results from the GII material deposition sample that represents the emission unit or activity in each volume source.

The summary of facility-wide HAP emissions presented in Table 3-8 identifies total metal HAP emissions from the Non-Ferrous Material Processing System.

### **3.4 Stockpile Fugitive Emissions**

#### **Updated Information**

Estimates of metal HAP emissions associated with fugitive stockpile particulate emissions were updated by using the results of metal analyses from samples of material deposition at GII (see Section 3.2.2 above).

Fugitive emissions from stockpiles include particulate matter and metal HAPs.

##### **3.4.1 Particulate Emissions**

Fugitive particulate emissions from stockpiles are estimated in accordance with procedures recommended by the Texas Commission on Environmental Quality (TCEQ) for calculation of emissions from crushed stone processing. Fugitive emissions from stockpiles are calculated using the following equation:

$$\begin{aligned} \text{PM Emission Rate (tpy)} &= ((\text{inactive day PM EF} \times \text{No. of inactive days}) \times (\text{stockpile area}/2000) \times \text{control factor}) + \\ &\quad ((\text{active day PM EF} \times \text{No. of active days}) \times (\text{stockpile area}/2000) \times \text{control factor}) \end{aligned}$$

Stockpile control factors are identified as follows:

Stockpile Control Method	Control Eff. (%)	Control Factor (1 - ctrl eff)
None	0	1
Wet material	50	0.5
Water	70	0.3
Chemicals/foam	80	0.2
Partial enclosure	50-85	0.5-0.15
Full enclosure	90	0.1
Enclosed by building	90	0.1
Washed sand/gravel	95	0.05
Washed sand/gravel with water spray	98.5	0.015
Manufacturer rating	0	0

A summary of stockpile fugitive particulate emissions is presented in Table 3-4.

### **3.4.2 Metal HAP Emissions**

As described in Section 3.2.2 above, detailed metal and metal HAP emissions from the Ferrous Material Processing, Non-Ferrous Material Processing, Stockpile operations, and fugitive road dust were estimated using metals analyses data from samples of material deposition collected from GII. The results of the GII metals analyses were applied to emission units and activities at GIII that correspond to the location of the GII samples. Section 3.2.2 above summarizes the results of the metals analyses from GII samples and describes how these results were applied to GIII emission units and activities.

For the purpose of modeling potential off site metal impacts, the various material stockpiles were designated as volume sources associated with either the Ferrous or Non-Ferrous Material Processing Systems. Estimated fugitive particulate emissions from each stockpile were assigned sample results from the GII material deposition sample that represents the material managed in each stockpile.

The summary of facility-wide HAP emissions presented in Table 3-8 identifies total metal HAP emissions from stockpile fugitive emissions.

## **3.5 Fugitive Emissions from Paved and Unpaved Roads**

### **Updated Information**

Estimates of metal HAP emissions included in fugitive particulate emissions from paved and unpaved roads were updated by using the results of metal analyses of samples of material deposition at GII.

Fugitive emissions from paved and unpaved roads include particulate and metal HAPs.

### **3.5.1 Particulate Emissions**

Facility roadways were divided into segments based on the type(s) of materials being transported for the purposes of estimating segment-specific particulate emissions to support an air dispersion modeling assessment of off-site metals impacts. The particulate emissions estimates described herein are greater than the estimated emissions included in the original application and have been updated to be consistent with emissions data used in the modeling assessment.

Fugitive emissions from vehicular traffic on paved and unpaved roadways were estimated by identifying the material streams delivered to the site, transferred internally, and transported from the site. These material streams consist of :

- Peddler Scrap Deliveries;
- Truck Scrap Delivery to the North Scrap Stockpile;
- Truck Scrap Delivery to the South Scrap Stockpile;
- Ferrous Scrap Shipment from the North Ferrous Stockpile;
- Ferrous Scrap Shipments from the South Ferrous Stockpile;
- Ferrous Waste Shipped Off-Site;
- Non-Ferrous Products Shipped Off-Site;
- Non-Ferrous Waste Shipped Off-Site; and,
- Internal Material Transfer by Facility End Loaders.

Facility roadways were divided into segments representing the primary routes taken by vehicles hauling each material stream identified above as shown in Figure 3-1. The number of trips over each segment for each material were estimated by dividing the estimated daily quantity of each material stream handled (tons/day) by the average weight of vehicles used (average of loaded and unloaded weight). The results of this analysis provided an estimate of daily miles traveled for vehicles hauling each material stream.

As described in Tables 3-5A and 3-5B (particulate emissions from paved and unpaved roadways respectively), the average vehicle weights were combined with site-specific parameters to estimate the uncontrolled particulate emissions in units of lb of particulate/vehicle mile traveled. A control efficiency (also identified in Tables 3-5A and 3-5B) was then applied to identify a controlled emission factor (lbs/vehicle mile traveled) for paved and unpaved roads. The facility will employ a program of sweeping and watering described in the facility's Fugitive Particulate Operating Program to minimize generation of fugitive emissions from facility roadways.

The controlled particulate emission factors were then combined with the estimated daily miles traveled for each material/vehicle type to calculate daily emissions of PM, PM<sub>10</sub> and PM<sub>2.5</sub>. Daily emissions were multiplied by annual operating days (6 days per week and 52 weeks per year) to estimate annual emissions. Monthly emissions were assumed to be 10% of annual emissions.

The estimated number and weight of vehicles required to operate the facility at its maximum throughput was calculated, and the mean vehicle weight was used in the fugitive particulate calculations for both paved and unpaved roads. The total daily vehicle miles traveled on-site for each type of vehicle was provided by facility personnel.

Approximately 95% of interior plant roadways will be paved with concrete or asphalt. The remaining approximately 5% of interior plant roadways, consisting of compacted crushed slag or similar materials, will be lightly traveled.

Fugitive particulate emissions from vehicular traffic on paved roadways are calculated pursuant to AP-42, Section 13.2.1 Paved Roads, using the following equation:

$E_{ext} = (k * (sL)^{0.91} * (W)^{1.02}) * (1 - (P/(4N)))$		Equation 2, AP42, Section 13.2.1 Paved Roads (Jan 2011)
$E_{ext} =$		Size specific annual average particulate emission factor (lb/VMT)
	0.011 PM	
K =	0.0022 PM <sub>10</sub>	Particle size multiplier lb/VMT (AP-42 Table 13.2.1-1)
	0.0054 PM <sub>2.5</sub>	
sL =	9.7	Mean controlled silt content, % (AP42 Table 13.2.1-3 Jan 2011 - Iron & Steel Range: 0.09 to 79; mean 9.7-g/m <sup>2</sup> )
W =		Mean vehicle weight , tons (use weighted average where available)
P =	120	Number of precipitation days (>0.01 in) per year (AP42 Fig 13.2.1.2 Jan 2011 - Chicago, IL)
N =	365	Averaging Period, annual
Control Efficiency =	%	Estimated Control Efficiency for periodic sweeping and watering

Table 3-5A presents a summary of the estimated fugitive particulate emissions from paved roadways.

Fugitive particulate emissions from vehicular traffic on unpaved roadways are calculated pursuant to AP-42, Section 13.2.2 Unpaved Roads, using the following equation:

$E_{ext} = (k * (s/12)^a * (W/3)^b) * ((N-P)/P)$		Equation 1a & 2, AP42, Section 13.2.2 Paved Roads (Nov 2006)
$E_{ext} =$		Size specific annual average particulate emission factor (lb/VMT)
	4.9 PM	
K =	1.5 PM <sub>10</sub>	Particle size multiplier lb/VMT (AP-42 Table 13.2.2-2)
	0.15 PM <sub>2.5</sub>	
s =	6	Mean controlled silt content, % (AP42 Table 13.2.2-2 Nov 2006 - Iron & Steel Production (%))
W =		Mean vehicle weight, tons (use weighted average where available)
P =	120	Number of precipitation days (>0.01 in) per year – Chicago, IL (AP42 Fig 13.2.2-2 Nov 2006)
N =	365	Averaging Period, annual
Control Efficiency =	%	Estimated Control Efficiency for periodic watering or chemical treatment

Table 3-5B presents a summary of the estimated fugitive particulate emissions from unpaved roadways.

### **3.5.2 Metal HAP Emissions**

As described in Section 3.2.2 above, detailed metal and metal HAP emissions from the Ferrous Material Processing, Non-Ferrous Material Processing, Stockpile operations, and fugitive road dust were estimated using metals analyses data from samples of material deposition collected from GII. The results of the GII metals analyses were applied to emission units and activities at GIII that correspond to the location of the GII samples. Section 3.2.2 above summarizes the results of the metals analyses from GII samples and describes how these results were applied to GIII emission units and activities.

For the purpose of modeling potential off site metal impacts, each identified roadway segment was assigned representative sample results from the GII material deposition samples.

The summary of facility-wide HAP emissions presented in Table 3-8 identifies total metal HAP emissions from roadway fugitive emissions.

## **3.6 Miscellaneous Natural Gas Combustion**

### **Updated Information**

There are no updates to estimated emissions from miscellaneous natural gas combustion.

Miscellaneous natural gas combustion sources will consist of environmental heaters.

The estimated miscellaneous natural gas combustion emissions are presented in Table 3-6. Emissions are calculated using a maximum natural gas firing rate of 10 MMBtu/hr, a natural gas higher heating value (HHV) of 1,020 Btu/scf, and standard USEPA natural gas emission factors from AP-42; Chapter 1.4; Tables 1.4-1 and 1.4-2.

Emission estimates are presented for criteria pollutants, greenhouse gas (GHG), and metal and organic HAPs.

## **3.7 Facility-Wide Criteria Pollutant Emissions**

An updated summary of facility-wide criteria pollutant emissions is presented in Table 3-7.

## **3.8 Facility-Wide HAP Emissions**

An updated summary of facility-wide HAP emissions is presented in Table 3-8.



**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility**

**General III, LLC  
11600 South Burley  
Chicago, Illinois 60614**

**Updated Emission Estimates  
January 27, 2020**

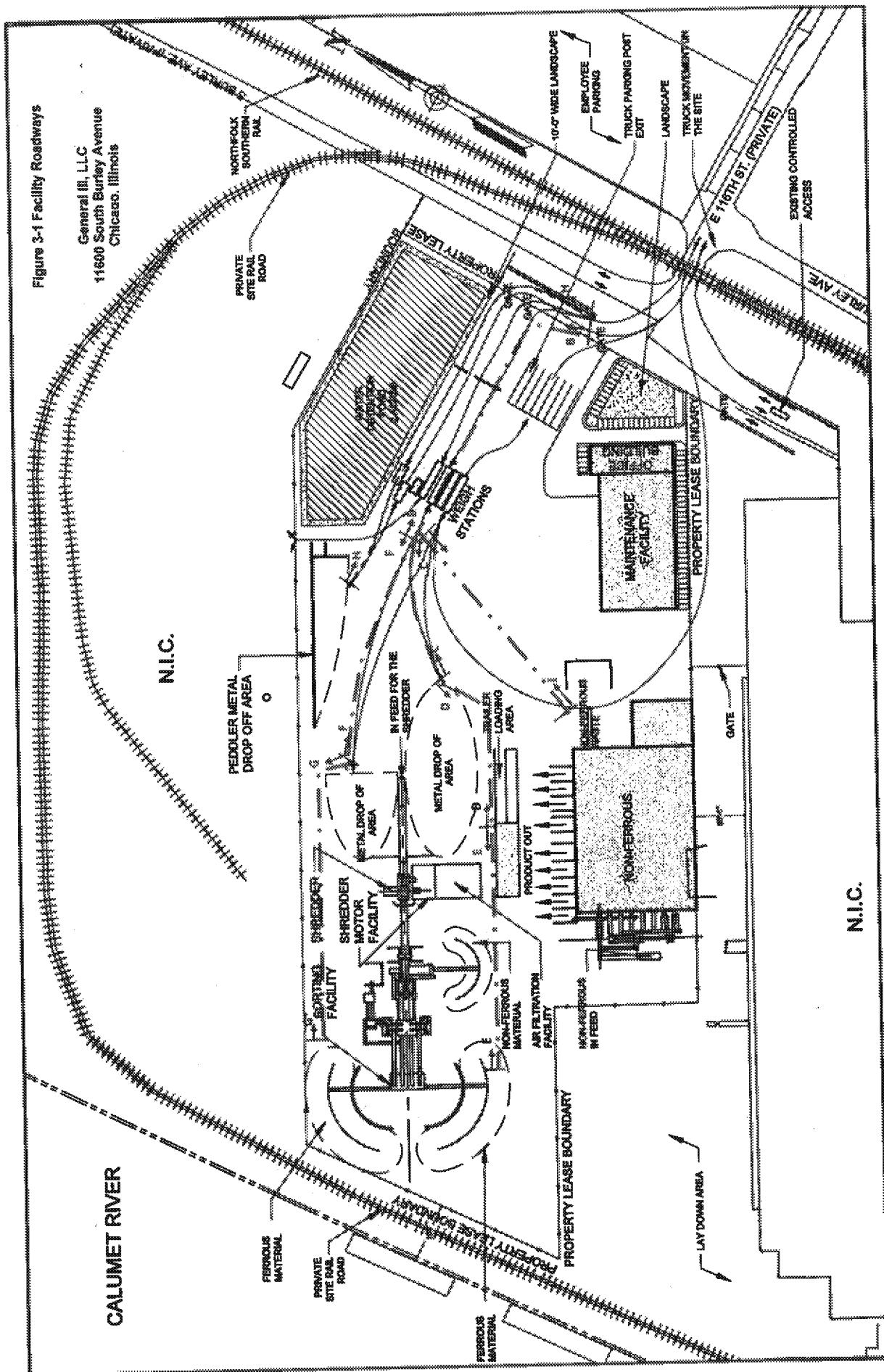
**FIGURES**

**Figure 3-1 – Facility Roadways**

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Figure 3-1 Facility Roadways

General Ill., LLC  
11600 South Burley Avenue  
Chicago, Illinois



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**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility**

**General III, LLC  
11600 South Burley  
Chicago, Illinois 60614**

**Updated Emission Estimates  
January 27, 2020**

**TABLES**

100%  $\text{CH}_3\text{COCH}_3$

Table 3-1A Summary of Controlled Shredder VOC and CO Emissions

General III, LLC - Chicago, Illinois

Parameter	Units	Values	Comment
<b>Captured VOC Emissions Controlled by RTO and Emitted Through the RTO/Scrubber Stack</b>			
Demonstrated Captured Shredder VOC Emission Factor <sup>a</sup>	lbs of VOC ton of gross shredder feed	0.5119	Worst case value with 51% ELFs from November 18, 2019 testing by Method 25A (as propane). (Assume VOM = THC)
Maximum Gross Shredder Feed Rate	tons/month	100,000	Permitted maximum shredder feed rates requested in shredder RTO construction permit.
Maximum Annual Shredder Throughput <sup>b</sup>	tons/year	1,000,000	
RTO VOC Control Eff.	%	98.0%	RTO manufacturer's guarantee. The November 2019 testing demonstrated a VOC control efficiency of 99%. Using 98% to calculate permit limits results in incorporating a safety factor of 2.0.
VOC emission safety factor		4.00	Safety factor used to establish permitted shredder VOC emission limit.
Shredder VOC Emissions <sup>a</sup>	tons/month	0.51	Maximum VOC emission rates requested in construction permit application.
	tons/year	5.12	
<b>CO Emissions (from combustion of natural gas and VOC)</b>			
CO emission factor measured at scrubber stack	lb/ton	0.0129	CO Emission Factor measured from November 14, 2019 emission testing
CO emissions safety factor		4.00	Safety factor applied to establish permitted shredder CO emission limits.
Total Shredder CO Emissions	tons/month	1.29	Maximum CO emission rates requested in construction permit application.
	tons/year	12.86	

a. VOC emissions measured by USEPA Method 25A minus methane, ethane, and compounds exempt from the federal definition of VOC and reported as propane.

b. Maximum annual shredder throughput requested in shredder RTO construction permit application based on recent operating data.

Table 3-1B Summary of Controlled Shredder Filterable Particulate Emissions

General III, LLC - Chicago, Illinois

Parameter	Units	Values	Comment
<b>Captured PM/PM<sub>10</sub> Emissions Controlled by Cyclone and Roll Media Filter and Emitted Through the RTO/Scrubber Stack</b>			
Demonstrated Filterable PM Emission Factor <sup>a</sup>	lbs of filterable PM ton of gross shredder feed	0.0047	Measured value from November 18, 2019 emission testing.
Maximum Annual Shredder Throughput <sup>b</sup>	tons/month	100,000	Permitted maximum shredder feed rates requested in shredder RTO construction permit.
	tons/year	1,000,000	
Filterable PM Emissions Safety Factor		4.00	Safety factor used to establish permitted shredder PM emission rates.
Controlled Shredder Filterable PM Emission Rates	tons/month	0.94	Permitted filterable PM/PM <sub>10</sub> emission rates requested in shredder RTO/Scrubber construction permit.
	tons/year	9.40	
Controlled Shredder Filterable PM <sub>10</sub> Emission Rates	tons/month	0.94	Assumes that all PM is PM10.
	tons/year	9.40	Estimates assume no PM/PM10 emission reductions in RTO/Scrubber.

a. Filterable PM emission rate measured by USEPA Methods 1 through 4 and Method 29.

b. Maximum annual shredder throughput requested in shredder RTO construction permit application based on recent operating data.

**Table 3-1C Summary of November 2019 Shredder RTO/Scrubber HAP Emissions**  
**General III, LLC - Chicago, Illinois**

Pollutant	Emission Factor Nov 2019 RTO/ Scrubber Emis Testing lb/ton	Permitted Shredder Thruput Rates	
		Maximum Hourly Emissions ton/month	Maximum Annual Emissions tpy
<b>Metal HAPs<sup>1</sup></b>			
Lead	≥ 1.38E-06 <sup>1</sup>	2.77E-04	2.77E-03
Manganese	1.99E-06 <sup>1</sup>	3.98E-04	3.98E-03
Mercury	≤ 4.46E-05 <sup>1</sup>	≤ 8.93E-03	≤ 8.93E-02
Nickel	3.30E-06 <sup>1</sup>	6.59E-04	6.59E-03
Antimony	≤ 1.12E-06 <sup>1</sup>	≤ 2.25E-04	≤ 2.25E-03
Arsenic	≤ 3.97E-07 <sup>1</sup>	≤ 7.94E-05	≤ 7.94E-04
Beryllium	≤ 8.90E-08 <sup>1</sup>	≤ 1.78E-05	≤ 1.78E-04
Cadmium	≤ 4.26E-07 <sup>1</sup>	≤ 8.51E-05	≤ 8.51E-04
Chromium	≤ 3.45E-06 <sup>1</sup>	≤ 6.90E-04	≤ 6.90E-03
Cobalt	≤ 1.06E-07 <sup>1</sup>	≤ 2.13E-05	≤ 2.13E-04
Phosphorus	≤ 1.21E-04 <sup>1</sup>	≤ 2.43E-02	≤ 2.43E-01
Selenium	≤ 6.05E-06 <sup>1</sup>	≤ 1.21E-03	≤ 1.21E-02
<b>Volatile HAPs<sup>2</sup></b>			
Ethylbenzene	6.67E-05 <sup>2</sup>	1.33E-04	1.33E-03
Styrene	1.33E-05 <sup>2</sup>	2.66E-05	2.66E-04
Toluene	3.33E-04 <sup>2</sup>	6.66E-04	6.66E-03
Tetrachloroethane (PCE)	2.67E-06 <sup>2</sup>	5.34E-06	5.34E-05
m,p-Xylene	1.33E-05 <sup>2</sup>	2.66E-05	2.66E-04
Benzene	4.00E-04 <sup>2</sup>	8.00E-04	8.00E-03
1,1,1-Trichloroethane	2.00E-04 <sup>2</sup>	4.00E-04	4.00E-03
Methylene Chloride	6.00E-05 <sup>2</sup>	1.20E-04	1.20E-03
Trichloroethylene (TCE)	6.67E-05 <sup>2</sup>	1.33E-04	1.33E-03
o-Xylene	6.67E-05 <sup>2</sup>	1.33E-04	1.33E-03
<b>Acid HAPs</b>			
Hydrochloric Acid	7.72E-04 <sup>1</sup>	1.54E-01	1.54E+00
Hydrofluoric Acid	3.18E-04 <sup>1</sup>	6.36E-02	6.36E-01
Total Metal HAPs		≤ 4.40E-02	≤ 4.40E-01
Total Organic HAPs		2.44E-03	2.44E-02
Total Acid HAPs		2.18E-01	2.18E+00
Total HAPs		≤ 2.64E-01	≤ 2.64E+00
Maximum Individual HAP	Hydrochloric Acid	1.54E-01	1.54E+00

1. Measured metal emission rates from hammermill shredder controlled by RTO/Scrubber from November 2019.
2. Uncontrolled organic compound emission rates, as presented in ISRI Title V Applicability Workbook, Table D-11F, adjusted for RTO with 98% destruction efficiency.
3. Chromium (metal) and compounds other than Chromium VI

**Table 3-1D Shredder RTO Natural Gas Combustion Emissions**  
**General III, LLC - Chicago, Illinois**

Pollutant	Pollutant Emission Factor <sup>a</sup> lb/MMscf	RTO Max Firing Rate 15.0 MMBtu/hr NG HHV = 1,020-Btu/scf Annual Gas Consumption 52,500 MMBtu/yr	
		ton/month <sup>b</sup>	tpy
Nitrogen Oxide (NOx)	100	0.26	2.57
Carbon Monoxide (CO)	84	0.22	2.16
Total Filterable PM	1.9	0.00	0.05
Total Condensable PM	5.7	0.01	0.15
Total Particulate Matter	7.6	0.02	0.20
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.00	0.02
Volatile Organic Compounds (VOC)	5.5	0.01	0.14
<b>Greenhouse Gas Emissions</b>			
Carbon Dioxide (CO <sub>2</sub> )	120,174	309.27	3,092.72
Methane (CH <sub>4</sub> )	2.2649	0.0058	0.06
Nitrous Oxide (N <sub>2</sub> O)	0.2265	0.0006	0.01
<b>Carbon Dioxide Equivalents (CO<sub>2</sub>e)<sup>c</sup></b>		<b>309.59</b>	<b>3,095.91</b>

a. AP-42 Emission factors from Tables 1.4-1 and 1.4-2.

b. Monthly emissions are assumed to be 10% of annual emissions.

c. Global Warming Potentials (GWP) for CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O are 1, 25, and 298 respectively (40 CFR 98 Subpart A).

**Table 3-1D Shredder RTO Natural Gas Combustion Emissions**  
**General III, LLC - Chicago, Illinois**

**Summary of HAP Emissions from Natural Gas Combustion**

HAP <sup>b</sup> Y/N	Pollutant	Emission Factor <sup>a</sup> (lb/10 <sup>6</sup> scf)		
			ton/month*	tpy
<b>Metal HAPs<sup>c</sup></b>				
Y	Lead	0.0005	1.29E-06	1.29E-05
Y	Manganese	3.80E-04	9.78E-07	9.78E-06
Y	Mercury	2.60E-04	6.69E-07	6.69E-06
Y	Nickel	2.10E-03	5.40E-06	5.40E-05
Y	Arsenic	2.00E-04	5.15E-07	5.15E-06
Y	Beryllium	< 1.20E-05	3.09E-08	3.09E-07
Y	Cadmium	1.10E-03	2.83E-06	2.83E-05
Y	Chromium	1.40E-03	3.60E-06	3.60E-05
Y	Cobalt	8.40E-05	2.16E-07	2.16E-06
Y	Selenium	< 2.40E-05	6.18E-08	6.18E-07
<b>Volatile HAPs<sup>d</sup></b>				
Y	Toluene	3.40E-03	8.75E-06	8.75E-05
Y	Hexane	< 1.80E+00	< 4.63E-03	< 4.63E-02
Y	Anthracene	< 2.40E-06	< 6.18E-09	< 6.18E-08
Y	Pyrene	5.00E-06	1.29E-08	1.29E-07
Y	Benzo(g,h,i)perylene	< 1.20E-06	< 3.09E-09	< 3.09E-08
Y	Indeno(1,2,3-cd)pyrene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Acenaphthylene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Benzo(b)fluoranthene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Fluoranthene	3.00E-06	7.72E-09	7.72E-08
Y	Benzo(k)fluoranthene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Chrysene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Dichlorobenzene	1.20E-03	3.09E-06	3.09E-05
Y	Formaldehyde	7.50E-02	1.93E-04	1.93E-03
Y	Benzo(a)pyrene	< 1.20E-06	< 3.09E-09	< 3.09E-08
Y	Dibenzo(a,h)anthracene	< 1.20E-06	< 3.09E-09	< 3.09E-08
Y	3-Methylcholanthrene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Benz(a)anthracene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	7,12-Dimethylbenz(a)anthracene	< 1.60E-05	< 4.12E-08	< 4.12E-07
Y	Benzene	< 2.10E-03	< 5.40E-06	< 5.40E-05
Y	Acenaphthene	< 1.80E-06	< 4.63E-09	< 4.63E-08
Y	Phenanthrene	1.70E-05	4.38E-08	4.38E-07
Y	Fluorene	2.80E-06	7.21E-09	7.21E-08
Y	Naphthalene	6.10E-04	1.57E-06	1.57E-05
Y	2-Methylnaphthalene	2.40E-05	6.18E-08	6.18E-07
<b>Total HAPs</b>			<b>4.86E-03</b>	<b>4.86E-02</b>
<b>Maximum Individual HAP</b>			<b>Hexane</b>	<b>4.63E-03</b>
				<b>4.63E-02</b>

a. Criteria pollutant emission factors for natural gas combustion - AP-42 Tables 1.4-1 and 1.4-2.

b. Hazardous Air Pollutant (HAP) as defined by Section 112(b) of the Clean Air Act.

c. Metal HAP emission factors from natural gas combustion - AP-42 Emission factors from Tables 1.4-4.

d. Organic HAP emission factors from natural gas combustion - AP-42 Emission factors from Tables 1.4-3.

e. Monthly emissions are assumed to be 10% of annual emissions.

**Table 3-1E Summary of Controlled Shredder Emissions  
General Iron Industries, Inc. - Chicago, Illinois**

Pollutant	Shredder RTO/Scrubber Stack Emissions <sup>c</sup>		Shredder RTO Natural Gas Combustion Emissions <sup>c,d</sup>		Total Shredder RTO/Scrubber Stack Emissions	
	ton/mo	ton/yr	ton/mo	ton/yr	ton/mo	ton/yr
NOx	-	-	0.26	2.57	0.26	2.57
CO <sup>e</sup>	1.29	12.86	0.22	2.16	1.50	15.02
PM <sup>a</sup>	0.94	9.40	0.02	0.20	0.96	9.60
PM10 <sup>a</sup>	0.94	9.40	0.02	0.20	0.96	9.60
SO2	-	-	0.00	0.02	0.00	0.02
VOM <sup>a,b</sup>	0.51	5.12	0.01	0.14	0.53	5.26
Total HAPs	0.26	2.64	0.00	0.05	0.27	2.69
Max Single HAP (HCl)	0.15	1.54			0.15	1.54
GHG (CO <sub>2e</sub> )	309.6	3,095.9	309.6	3,095.9	619.2	6,191.8

a. VOM and PM/PM<sub>10</sub> emission rates in the above table are based on a maximum monthly feed rate of 100,000 tons/month and a maximum annual feed rate of 1,000,000 tons/year.

b. VOM emissions are based on Method 25A testing performed in November 2019.

c. See Table 1A for VOM emission estimates, Table 1B for PM/PM10 emission estimates, Table 1C for HAP emission estimates, and Table 1D for RTO natural gas combustion emission estimates.

d. Natural gas emissions are based on a maximum RTO firing rate of 15.00 MMBtu/hr.

e. CO emissions are based on a measured November 2019 emission factor and an applied safety factor.

Table 3-2 - Ferrous Material Processing - Particulate Emissions  
General III, I.I.C. - Chicago, Illinois

Row	Equipment Generating Emissions	Description	Material	Moisture > 1.5% Conveyed	Transferring Point Location / Containerized / Outside	Type of Transfer Point: Pile, Conveyer	Short Carpenter Emissions Factor (%)	PM10 Emissions			PM2.5 Emissions		
								From Pile	To Carpenter	Rate	Rate	Rate	
8	C-018	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
1	Barge 1	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
2	Barge 2	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
3	Barge 3	Ferrous Transfer Conveyer	Shred	S,4% <sup>a</sup>	Outside	N	N/A	Drop	73,400	734,000	0.0003127 %	0.0003165	0.01659
4	C-001	Stranded Material Transfer Conveyor	Shred	Y	Outside	N	N/A	A	100,000	1,000,000	0.000314 %	0.000313	0.01659
5	C-002	Stranded Material Transfer Conveyor	Shred	Y	Outside	N	N/A	A	200,0	2,000	0.000314 %	0.000311	0.01659
6	C-002	Melt Pick Removed by Fisher Pile	Shred	Y	Outside	P	N/A	A	90,000	900,000	0.000314 %	0.000318	0.01659
7	C-003	Ferrous Transfer Conveyer	Residue	Y	Outside	N	N/A	A	36,000	360,000	0.000314 %	0.01818	0.00061
8	C-003	Ferrous Transfer Conveyer	Ferrous	Y	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
9	C-006	Ferrous Transfer Conveyer	Shred	Y	Outside	Y	Z-Bar Air Loop	A	35,600	356,000	0.000314 %	0.000316	0.01659
10	C-007	Ferrous Transfer Conveyer	Shred	Y	Outside	Y	Z-Bar Air Loop	A	35,600	356,000	0.000314 %	0.000316	0.01659
11	C-008	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	31,000	310,000	0.000314 %	0.000318	0.01659
12	C-009	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	25,600	256,000	0.000314 %	0.000319	0.01659
13	C-010	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	25,600	256,000	0.000314 %	0.000318	0.01659
14	C-011	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	31,000	310,000	0.000314 %	0.000317	0.01659
15	C-013	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	21,200	212,000	0.000314 %	0.000318	0.01659
16	C-013	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	25,600	256,000	0.000314 %	0.000319	0.01659
17	C-014	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	25,600	256,000	0.000314 %	0.000318	0.01659
18	C-018	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	21,000	210,000	0.000314 %	0.000317	0.01659
19	C-016	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
20	C-020	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	73,400	734,000	0.000314 %	0.000317	0.01659
21	C-022	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	11,000	110,000	0.000314 %	0.000317	0.01659
22	C-023	Ferrous Transfer Conveyer	Shred	Y <sup>a</sup>	Outside	N	N/A	A	11,000	110,000	0.000314 %	0.000317	0.01659
23	C-024	Non-ferrous Transfer Conveyer	Ferrous	Y	Outside	N	N/A	A	800	8,000	0.000314 %	0.000312	0.01659
24	C-025	Non-ferrous Transfer Conveyer	Ferrous	Y	Outside	N	N/A	A	4,000	40,000	0.000314 %	0.000313	0.01659
25	C-025	Non-ferrous Transfer Conveyer	Ferrous	Y <sup>a</sup>	Outside	N	N/A	A	2,000	20,000	0.000314 %	0.000313	0.01659

first

material

removed

by magnet.

material

removed

by second

Table 3-2 - Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row	Equipment Identifying Information	Material	Transfer Point Location / Outside)	Transfer Point Controlled (Y/N)	Type of Transfer Point Control	Direct Plating Eff. (%)	Direct Capture Eff. (%)	Indirect Capture Eff. (%)	PM Emissions		PM10 Emissions		PM2.5 Emissions	
									Spots	Spots	Spots	Spots	Spots	Spots
26	C-026	Ferrous Transfer Conveyor	Ferrous	Y	Outside	N	N/A	A	2,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
27	C-027	Ferrous Transfer Conveyor	Ferrous	Y	Outside	N	N/A	A	1,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
28	C-028	Non-magnetic Transfer Conveyor	Ferrous	Y	Outside	N	N/A	A	2,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
29	C-029	Non-magnetic Transfer Conveyor	Ferrous	Y	Outside	N	N/A	A	2,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
30	C-031	ASR Transfer Conveyor	Residue	Y	Outside	N	N/A	A	3,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
31	C-032	ASR Transfer Conveyor	Residue	Y	Outside	N	N/A	A	3,000	0.000034 *	0.00003	0.00003	0.000033 *	0.00003
32	C-033	Magnetic Material Shredder	Shredded	Y	Outside	N	N/A	A	1,000	10,000	0.000034 *	0.00003	0.000033 *	0.00003
33	C-033	ASR Non Removed by Magnet E-2	Residue	Y	Outside	N	N/A	A	25,000	250,000	0.000034 *	0.00003	0.000033 *	0.00003
34	C-034	Ferrous Transfer Conveyor	Shredded	Y	Outside	N	N/A	A	1,000	10,000	0.000034 *	0.00003	0.000033 *	0.00003
35	C-035	Ferrous Transfer Conveyor	Shredded	Y	Outside	N	N/A	A	1,000	10,000	0.000034 *	0.00003	0.000033 *	0.00003
36	C-036	ASR Transfer Conveyor	Residue	Y	Outside	N	N/A	A	35,000	250,000	0.000034 *	0.00003	0.000033 *	0.00003
37	E-011	Drop Scale Center Unprepared	Y	Outside	N	N/A	A	100,000	1,000,000	0.000034 *	0.00003	0.000033 *	0.00003	
38	E-015	Z-Bone Separator	Ferrous	Y	Outside	N	N/A	A	800	4,000	0.000034 *	0.00003	0.000033 *	0.00003
39	E-016	Z-Bone Separator	Non-Clean	Y	Outside	N	N/A	A	400	4,000	0.000034 *	0.00003	0.000033 *	0.00003
40	E-025	Shredder Under Mill	Shredded	Y	Inside	N	N/A	A	100,000	1,000,000	0.000034 *	0.00003	0.000033 *	0.00003
41	E-07	Laboratory Conveyors	Shredded	Y	Outside	N	N/A	A	37,400	374,000	0.000034 *	0.00003	0.000033 *	0.00003
42	E-07	Magnet E-2	Shredded	Y	Outside	N	N/A	A	37,400	374,000	0.000034 *	0.00003	0.000033 *	0.00003
43	E-08	ASR Non Removed by Magnet	Shredded	Y	Outside	N	N/A	A	800	4,000	0.000034 *	0.00003	0.000033 *	0.00003
44	E-09	Ferrous Removed by Magnet	Residue	Y	Outside	N	N/A	A	31,000	310,000	0.000034 *	0.00003	0.000033 *	0.00003
45	E-10	Ferrous Removed by Magnet	Shredded	Y	Outside	N	N/A	A	25,500	255,000	0.000034 *	0.00003	0.000033 *	0.00003
46	E-11	Ferrous Removed by Magnet	Shredded	Y	Outside	N	N/A	A	25,600	256,000	0.000034 *	0.00003	0.000033 *	0.00003
47	E-11	Ferrous Removed by Magnet	Shredded	Y	Outside	N	N/A	A	11,000	110,000	0.000034 *	0.00003	0.000033 *	0.00003
48	E-11	Ferrous Removed by Magnet	Shredded	Y	Outside	N	N/A	A	11,000	110,000	0.000034 *	0.00003	0.000033 *	0.00003
49	E-12	Ferrous Removed by Magnet	Ferrous	Y	Outside	N	N/A	A	1,000	10,000	0.000034 *	0.00003	0.000033 *	0.00003
50	E-13	Ferrous Removed by Magnet	Ferrous	Y	Outside	N	N/A	A	100	2,000	0.000034 *	0.00003	0.000033 *	0.00003

**Table 3-2 - Ferrous Material Processing - Particulate Emissions**  
**General Ill. U.C. - Chicago, Illinois**

Row	Equipment Generating Emissions	Material	Transfer Point	Type of Transfer Point	Emissions Factor (t/yr)	Emissions Factor Sources	PM10 Emissions			PM2.5 Emissions			
							Outside	Controlled	Inside	Outside	Controlled	Inside	
8	E-8 Description	Converged	1.5%	Y/N	N/A	N/A	A	200	2,000	0.000046 *	0.00003	0.00003	
51	E-13 Ferrous Removed by E-	Ferrous	Y	Outside	N	N/A	A	N/A	N/A	0.000046 *	0.00003	0.00003	
52	E-14 Melt Not Removed by Separator	Ferrous	Y	Outside	N	N/A	A	N/A	N/A	0.000046 *	0.00003	0.00003	
53	E-7 ASR Not Removed by Magnet	Shred	Y	Outside	N	N/A	A	400	4,000	0.00014 *	0.0001	0.0001	
54	E-7 Ferrous Removed by Magnet E-7	Residue	Y	Outside	N	N/A	A	37,800	370,000	0.00014 *	0.00013 *	0.00013 *	
55	E-7 Truck Dumping of Raw Feed	Unprepared	5.4	Y	Outside	N		0.000046	0.000046	0.000046 *	0.00003	0.00003	
56	E-7 Raw Feed from Ground	Unprepared	5.4	Y	Outside	N		Drop	100,000	1,000,000	0.000127	0.000128	0.000128
57	E-7 After Truck Dumping Non-metalllic Non-metalllic	Residue	N	Outside	N			37,400	374,000	0.000214 *	0.000212	0.000212	
58	E-7 Poker Loadout	Poker	N	Outside	N			200	2,000	0.000204	0.000203	0.000203	
59	E-7 Clam	Drop Raw Scraps to Hinged Conveyor	N	Outside	N	N/A		300,000	3,000,000	0.000024 *	0.000025	0.000025	
60	C-030	Shred	1.5%	Y	Crusher	25%		Drop	450	4,500	0.000763 *	0.001217	0.001217
61	C-027	ASR Transfer Converger to Stockpile	10.8%	N	Outside	N		Drop	25,000	250,000	0.000053	0.000053	0.000053
62	E-06 Stockpile	Poker Pickler Chute to Shredder	1.5%	Y	Outside	N		Drop	200	2,000	0.000761 *	0.001072	0.001072
63	E-14 Final Discharge from Shredder	Ferrous	1.5%	Y	Outside	N		Drop	150,00	1,500	0.000761 *	0.001066	0.001066
64	SC-001 Supplemental Converger	Shredder	Y	Outside	N	N/A	A	36,600	366,000	0.000014 *	0.000015	0.000015	
65	SC-009 Converger	Ferrous	Y	Outside	N	N/A	A	400	4,000	0.000014 *	0.000014	0.000014	
66	SC-010 Supplemental Converger	Shredder	Y	Outside	N	N/A	A	36,500	365,000	0.000014 *	0.000014	0.000014	
67	SC-010 Converger	Ferrous	Y	Outside	N	N/A	A	400	4,000	0.000014 *	0.000014	0.000014	
68	SC-005 Supplemental Converger	Shredder	Y	Outside	N	N/A	A	25,600	256,000	0.000114 *	0.000118	0.000118	
69	SC-008 Converger	Shredder	Y	Outside	N	N/A	A	25,600	256,000	0.000114 *	0.000118	0.000118	
70	C-006 Converger	Shredder	Y	Outside	N	N/A	A	31,900	319,000	0.000014 *	0.000014	0.000014	
71	C-014 Ferrous Transfer	Shredder	Y	Crusher	N	N/A	A	73,800	738,000	0.000014 *	0.000014	0.000014	
72	C-006 Converger	Shredder	Y	Crusher	N	N/A	A	37,300	373,000	0.000014 *	0.000014	0.000014	
73	C-012 Ferrous Transfer	Shredder	Y	Crusher	N	N/A	A	73,800	738,000	0.000014 *	0.000014	0.000014	
74	C-012 Ferrous Transfer	Shredder	Y	Crusher	N	N/A	A	73,800	738,000	0.000014 *	0.000014	0.000014	
75	C-013 Ferrous Transfer	Shredder	Y	Crusher	N	N/A	A	73,800	738,000	0.000014 *	0.000014	0.000014	

Revised Emission Tables - 01/27/20

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**Table 3-2 - Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois**

Row #	ID #	Description	Annual Throughput		PM2.5 Emissions										
			Material Conveyed	Y/N	Transfer Point Location Controlled (Y/N)	Type of Transfer Point Control	Start Pileup Capture Eff. (%)	Dust Control Eff. (%)	Emission Factor Sources	tpm	tpy	t/hour	tpy	Rate/mo.	ton/yr
<b>Mass Monthly Throughput</b>															
10	1001	Services - General	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives to C033 in C056.	
11	1002	Services - General	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives to C033 in C056.	
12	1003	Ferrous Material Processing	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
13	1004	Crushing	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
14	1005	Stacking between Buildings 2 & Building 3	Steel	N	Crushed	N	100%	100%	100%	1,300,000	1,300,000	100	1,300,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
15	1006	General Handling	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
16	1007	General Handling Crushed Materials	Crushed	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
17	1008	General Handling Crushed Materials	Crushed	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
18	1009	Ferrous Transfer System	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
19	1010	Services - General	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
20	1011	Services - General	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
21	1012	Ferrous Transfer System	Steel	N	Crushed	N	100%	100%	100%	734,000	734,000	100	734,000	Alternatives from 300% of measured throughout assigned to C033 in C056.	
<b>Rate/mo.</b>															
<b>ton/yr</b>															
<b>Rate/mo.</b>															
<b>ton/yr</b>															
<b>Rate/mo.</b>															
<b>ton/yr</b>															
<b>Rate/mo.</b>															
<b>ton/yr</b>															

a1. Controlled particulate matter emission factor from AP-42, Table 11.19.2-2 for conveying based on conservative assumption that moisture content is greater than 1.5% due to water added in the shredder.

a2. Material moisture was assumed to be the mean of material moisture contents identified in AP-42, Table 11.2-4-1.

a3. Northern Metals (Minneapolis, MN) found moisture content of ASR in the range of 20 to 30%, from MPCA Construction Permit Technical Support Document for Northern Metals in Becker MN, Stream C04G52.

a4. Moisture content of raw materials is assumed to be >1.5% based on application of water from winter atomization controls in AP-42, Section 11.19.2-2 for conveying. If moisture content is greater than 1.5% by weight, controlled emission factors are used.

b. Uncontrolled emission factor calculated according to material slope equation in AP-42, Section 13.2-4-3. Emissions calculated with control ERF factor factored for source being inside of a building.

c. Uncontrolled emission factor calculated according to material slope equation in AP-42, Section 13.2-4-3.

d. Uncontrolled particulate matter emission factors from AP-42, Table 11.19.2-2 for conveying. If moisture content is greater than 1.5% by weight, controlled emission factors are used.

e. Uncontrolled particulate matter emission factors from AP-42, Table 11.19.2-2 for screening. If moisture content is greater than 1.5% by weight, controlled emission factors are used.

f. Uncontrolled particulate matter emission factors from AP-42, Table 11.19.2-2 for crushing. Use uncontrolled emission factor to be conservative.

g. Particulate matter emission factors from AP-42, Table 11.19.2-2 for conveying. For sources controlled by a dust collector the emission factor is multiplied by the identified capture ERF, and then by the quantity of 1-control ERF. Dust collectors went back to the building. These emission

h. Handled total metals PM2.5 emission rate expressed as percent of estimated PM from various material handling.

i. Alternatives to C033 in C056.

j. Alternatives to C033 in C056.

k. Alternatives from 300% of measured throughout assigned to C033 in C056.

l. Alternatives from 300% of unhandled through control ERF, adjusted to Share 2 to Share 3.

m. Emissions calculated and converted to fixed rate annual control species.

n. Alternatives to C033 in C056.

o. Alternatives from 300% of measured throughout assigned to C033 in C056.

p. Alternatives to C033 in C056.

q. Alternatives to C033 in C056.

r. Alternatives to C033 in C056.

s. Alternatives to C033 in C056.

t. Alternatives to C033 in C056.

u. Alternatives to C033 in C056.

v. Alternatives to C033 in C056.

w. Alternatives to C033 in C056.

x. Alternatives to C033 in C056.

y. Alternatives to C033 in C056.

z. Alternatives to C033 in C056.

Table 3-2 - Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row #	Description	Material Conveyed	Transfer Point: Indoors / Outdoors Y / N	Type of Transfer Point: Controlled / Uncontrolled Y / N	Dust Picking Catches [%]	Emissive Factor Source	PM Emissions			PM2.5 Emissions		
							Spw	Spm	Spn	Spw	Spm	Spn
1	Max Monthly Throughput 100,000 tons Annual Throughput 1,200,000 tpy											

**Material Drop PM Calculations [AP-42, Section 13.2.4.3]**

$\epsilon = \text{emission factor (kg/t or material dropped)}$

$$\epsilon = k \cdot (0.0032) \times \left(\frac{U}{M/2}\right)^{1/3}$$

$k = \text{particle size multiplier (dimensionless)}$

$U = \text{mean wind speed}$

<http://www.airconcepts.com/weather/sep/chicago/estimate.html>

$M = \text{material moisture content [%]}$

$U = 3.0$  high - annual average wind speed for Chicago (Midway Airport)

$k = 0.74$  PM - AP-42, Section 13.2.4, for particle size > 30  $\mu\text{m}$

$U = 0.35$  PM - AP-42, Section 13.2.4, for particle size < 10  $\mu\text{m}$

$M = 0.053$  PM - AP-42, Section 13.2.4, for particle size < 2.5  $\mu\text{m}$

$M = 1.5$  Moisture content for use of controlled emission factors for crushed stone processing - Conveyor Transfer Points - AP-42, Table 11.19.2.2.

The material moisture content for stockpile drop emission calculations varies by material - see Column f above.

**Summary of Ferrous Material Processing System Emission Points and Emissions by Emission Factor Type**

# of Emissions Points	Process Rate Spw	Process Rate Spm	Process Rate Spn	PM Emissions			PM2.5 Emissions		
				Factor	Spw	Spn	Factor	Spw	Spn
59	1,444,050	14,440,120	0,00034	0.10	0.96	0.000046	0.03	0.31	0.000013
Conveyor Transfer Points									
3	131,620	1,376,000	0,0002134	0.01	0.14	0.0001	0.01	0.07	0.000015
3 Truck/Barge loads									
7 Stockpile Drops									
Total Emissions				0.80	2.63	0.13	0.87	1.25	0.23

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row	Equipment Governing Emissions	Material	Transfer Point Location	Moisture Content / Outside / Covered	Type of Transfer Point Controlled (Y/N)	Transfer Point Description	Dust Pitcher	Chest	Exhalation Filter	Material Throughput Rate(s)	PMs			PMs			
											Emissions	Source	Rate	Emissions	Source	Rate	
8	15.18 Dustbin	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	94.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
1	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
2	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
3	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
4	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
5	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
6	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
7	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
8	Shaker	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
9	E-19 Induction Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
10	E-19 Reduction Soother	Wire & Fuzz	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
11	E-20 Whisker Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
12	E-20 Induction Soother	Wire	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
13	E-25 Induction Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
14	E-25 Induction Soother	Wire & Fuzz	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
15	E-25 Induction Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
16	E-26 Reduction Soother	Wire	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
17	E-30 Induction Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
18	E-30 Induction Soother	Zinc	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
19	E-31 Induction Soother	Zinc	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
20	E-37 Reduction Soother	Zinc	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
21	E-37 Induction Soother	Residue	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
22	E-39 Induction Soother	Bright Zinc	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
23	E-39 Induction Soother	Bright Zinc	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
24	Miller Separator	Transfer Conveyor	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
25	Miller Separator	Transfer Conveyor	N	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
26	Milner	Dust to container	Residue	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f
27	Milner	Dust to container	Residue	Inside	Y	Dust	Collector	Eff.	Eff.	92.1	921	0.002200	Note f	Note f	0.0007460	Note f	Note f

Notes: 1. Zinc - Zinc Oxide - 0.00000314  
2. Zinc - Zinc Oxide - 0.00000314

**Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions**  
**General III, LLC - Chicago, Illinois**

Row#	Equipment Identifying Endpoints	Description	Material	Transfer Point Location	Transfer Point Control (Y/N)	Type of Transfer Point Control	Dust Pickup Control (%)	Dust Capture Eff. (%)	Emissions Factor Scenario	Material Throughput Rates	PM10 Emissions		PM2.5 Emissions		
											Eff.	DC	Eff.	DC	
8	368	Dust to conveyor	Conveyed	> 3.5% Outside / Outside	N	Inside	Y	0.00015	DC	A	3.465	0.0001540	Note f	Note f	
23	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	A	3.465	0.0001540	Note f	Note f	
29	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	DC	A	3.465	0.0001540	Note f	Note f	
30	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	DC	Drop	2.11	0.00760	Note f	Note f	
31	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
32	Shaker	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
33	Shaker	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
34	Shaker	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
35	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
36	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
37	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
38	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
39	Material Drop to container	Zorb8	Residue	1.5% + Inside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
40	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
41	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
42	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
43	Material Transfer Conveyor	Residue	Residue	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
44	Material Transfer Conveyor	Product	Product	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
45	Material Transfer Conveyor	Product	Product	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
46	Shaker	Transfer Conveyor	Product	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
47	Shaker	Transfer Conveyor	Product	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
48	Shaker	Transfer Conveyor	Product	> 3.5% Inside / Outside	N	Inside	Y	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
49	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
50	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
51	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
52	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
53	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f
54	Shaker	Residue	Residue	> 3.5% Inside / Outside	N	Inside	N	0.00015	Eff.	DC	Drop	2.11	0.00760	Note f	Note f

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row #	Equipment Generating Emissions	Material Conveyed	Material Location Inside / Outside	Y/N	Transfer Point Controlled	Type of Transfer	Dust Pick-up Control Eff.	Dust Capture Eff.	Dust Collection	Emission Factor Source	Resistive Throatless Boxes		Pneumatic Emissions		Pneumatic Emissions	
											Eff.	Eff.	Eff.	Eff.	Eff.	Eff.
8	85' S. Belt conveyor	Residue	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
55	Shaker	Dust to container	N	Inside	N	Collector	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
56	Shaker	Dust to container	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
57	Shaker	Transfer Conveyor	N	Inside	N	Collector	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
58	Shaker	Transfer Conveyor	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
59	Shaker	Transfer Conveyor	N	Inside	N	Collector	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
60	Shaker	Transfer Conveyor	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
61	Shaker	Transfer Conveyor	N	Inside	N	Collector	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
62	Shaker	Transfer Conveyor	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
63	Shaker	Transfer Conveyor	N	Inside	N	Collector	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
64	Shaker	Transfer Conveyor	N	Inside	N	Dust	100%	DC	A	36.9	389	0.003000 :	Note f	Note f	0.003100 :	Note f
65	C-021	Conveyor	Wire	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
66	C-025	Conveyor	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
67	C-026	Conveyor	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
68	C-027	Conveyor	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
69	C-028	Conveyor	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
70	C-032	Conveyor	Zinc	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
71	C-033	Conveyor	Wire	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
72	C-035	Conveyor	MgO/ZnC	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
73	E-18	Vibratory Feeder	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
74	E-24	Vibratory Feeder	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
75	E-29	Vibratory Feeder	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
76	E-36	Vibratory Feeder	Residue	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
77	E-38	Vibratory Feeder	Zinc	Inside	Y	Y	100%	DC	A	77.4	774	0.003000 :	Note f	Note f	0.003100 :	Note f
78	E-53	Separator	Heavy Zinc	Inside	N	Collector	100%	DC	A	128.0	1,280	0.003000 :	Note f	Note f	0.003100 :	Note f
79	E-54	Separator	Lights Zinc	Inside	N	Collector	100%	DC	A	128.0	1,280	0.003000 :	Note f	Note f	0.003100 :	Note f
80	E-55	Eddy Current Separator	Residual/Dro	Inside	N	Dust	100%	DC	A	1,231.0	12,310	0.003000 :	Note f	Note f	0.003100 :	Note f
81	ECS	Eddy Current Separator	Residue	Inside	N	Collector	100%	DC	A	147.4	1,474	0.003000 :	Note f	Note f	0.003100 :	Note f

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions  
General III, LCC - Chicago, Illinois

Row	Equipment Generating Emissions	Material	Location / Conditioned Covered	Transfer Piping Controlled by P179	Type of Transfer Point	Dust Pickup Collector	Emission Factor (t/h)	Dust Control Eff.	Control Eff.	PM10 Emissions		PM2.5 Emissions	
										Material Type	Rate t/h	Rate t/h	Rate t/h
8	ID # Description	Residue	N	Inside	Dust	Collector	0.00%	DC	A	163.2	1,632	0.003000	Note f
82	Elevator Transfer Conveyor	Residue	N	Inside	Dust	Collector	100%	DC	A	1,297.4	12,974	0.003000	Note f
83	Transfer to conveyor	Residue	N	Inside	Dust	Collector	100%	DC	A	1,297.4	12,974	0.003000	Note f
84	FC-01 Conveyor	Zebra	N	Inside	Y	Collector	100%	DC	A	184.3	1,843	0.003000	Note f
85	FC-02 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	1,033.0	10,330	0.003000	Note f
86	FC-03 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	892.6	8,926	0.003000	Note f
87	FC-04 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	162.2	1,622	0.003000	Note f
88	FC-05 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	692.9	6,929	0.003000	Note f
89	FC-06 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	1,297.4	12,974	0.003000	Note f
90	FC-07 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	1,548.0	15,480	0.003000	Note f
91	FC-08 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	1,548.0	15,480	0.003000	Note f
92	FC-09 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	619.2	6,192	0.003000	Note f
93	FC-10 Conveyor	Residue	1.5% + Inside	Y	Dust	Collector	100%	DC	A	154.8	1,548	0.007500	Note f
94	FC-11 Conveyor to stockpile	Residue	1.5% + Inside	Y	Dust	Collector	100%	DC	A	154.8	1,548	0.007500	Note f
95	FC-12 Conveyor	Product	N	Inside	Y	Collector	100%	DC	A	6.2	62	0.002000	Note f
96	FC-13 Conveyor	Product	N	Inside	Y	Collector	100%	DC	A	6.2	62	0.003000	Note f
97	FC-14 Conveyor	Product	N	Inside	Y	Collector	100%	DC	A	12.4	124	0.003000	Note f
98	FC-15 Conveyor	Product	N	Inside	Y	Collector	100%	DC	A	12.4	124	0.003000	Note f
99	FC-16 Conveyor	Product	1.5% + Inside	Y	Dust	Collector	100%	DC	A	12.4	124	0.007500	Note f
100	FC-17 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	654.5	6,545	0.003000	Note f
101	FC-18 Conveyor	Residue/	N	Inside	Y	Collector	100%	DC	A	1,231.0	12,310	0.003000	Note f
102	FC-19 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	1,531.0	15,310	0.003000	Note f
103	FC-21 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	840.3	8,403	0.003000	Note f
104	FC-22 Conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	410.2	4,102	0.003000	Note f
105	Transfer to conveyor	Residue	N	Inside	Y	Collector	100%	DC	A	3,350.3	33,503	0.003000	Note f
106	Feeder	Transfer to Eddy Current	N	Inside	Y	Collector	100%	DC	A	181.2	1,812	0.003000	Note f
107	Feeder	Separation	N	Inside	Y	Collector	100%	DC	A	1,292.4	12,924	0.003000	Note f
108	Feeder	Transfer to Eddy Current	N	Inside	Y	Collector	100%	DC	A	1,292.4	12,924	0.003000	Note f
	Reviewed	Entire Facility											

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row	Equipment Generating Emissions	Material	Transfer Point Location (Inside / Outside)	Type of Transfer Point	Dust Pickups	Dust Control Eff.	Dust Capture Eff.	Dust Control %	Emissions Source	PM2.5 Emissions			
										Controlled	Uncontrolled	ton/min	tph
8	C-018 Conveyor	Metals	> 3.5%	Conveyed	N	A	D/C	100%	1,083.6	18,836	0.003000	Note f	Note f
109	Shaker Transfer Conveyor	Residue	N	Inside	N	A	D/C	100%	1,074	1,474	0.000000	Note f	Note f
110	Shaker Transfer Conveyor	Residue	N	Inside	N	A	D/C	100%	1,074	1,474	0.000000	Note f	Note f
111	Drop to container	Zores	1.5% *	Inside	N	A	D/C	100%	258	258	0.007600	Note f	Note f
112	Conveyer	Residue	Y	Outside	Y	N	N/A	N/A	N/A	N/A	0.5149	0.1464	1,4441
113	C-001 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
114	C-002 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
115	C-004 Conveyor	Ferrous	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
116	C-005 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
117	C-008 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
118	C-005 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
119	C-006 Conveyor	Residue	N	Outside	N	N/A	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
120	C-007 Conveyor	Residue	N	Inside	Y	N	E/C	100%	58,050	58,050	0.003000	0.000000	0.000000
121	C-008 Conveyor	Residue	N	Inside	N	E/C	100%	58,050	58,050	0.003000	0.000000	0.000000	0.000000
122	C-009 Conveyor	Residue	N	Outside	N	N/A	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
123	C-010 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
124	C-011 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
125	C-012 Conveyor	Residue	N	Inside	Y	N	E/C	100%	8146	8146	0.003000	0.000000	0.000000
126	C-013 Conveyor	Residue	N	Inside	Y	N	E/C	100%	8146	8146	0.003000	0.000000	0.000000
127	C-014 Conveyor	Residue	N	Inside	Y	N	E/C	100%	31,388	31,388	0.003000	0.000000	0.000000
128	C-015 Conveyor	Ferrous	N	Inside	Y	N	E/C	100%	5146	5146	0.003000	0.000000	0.000000
129	C-016 Conveyor	Ferrous	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
130	C-017 Conveyor	Ferrous	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
131	C-018 Conveyor	Ferrous	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
132	C-019 Conveyor	Logits	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
133	C-020 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
134	C-021 Conveyor	Residue	N	Outside	Y	N	N/A	N/A	N/A	N/A	0.000000	0.000000	0.000000
135	C-022 Conveyor	Wood	N	Outside	Y	Y	Wood	100%	294.8	294.8	0.000000	0.000000	0.000000
		Non-Ferrous											

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Reviewed: 1/26/2018 - 3172723

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions

General III, LLC - Chicago, Illinois

Row#	Equipment/Streamlining Emission	Emissions		Emissions		Emissions		Emissions	
		ECS Enc. PM4 Control Eff.							
136	C-023 - Collector to Wind Shaker Residue	N	Outside	Y	Wind Shaker	100%	100%	2,686.8	26,868
137	C-024 - Conveyor to Wind Shaker Residue	N	Outside	Y	Wind Shaker	100%	100%	3,686.9	36,869
138	C-038 - Conveyor	N	Outside	Y	N/A	N/A	N/A	2,032.7	20,327
139	C-035 - Conveyor Residue	N	Inside	Y	EC3	100%	80%	596.1	5,961
140	C-039 - Conveyor Non-Ferrous Residue	N	Outside	N	N/A	N/A	N/A	786.9	7,869
141	C-040 - Conveyor Residue	N	Outside	N	N/A	N/A	N/A	1,020.0	10,200
142	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	2,540.0	25,400
143	C-040 - Conveyor Residue	N	Outside	N	N/A	N/A	N/A	1,545.3	15,453
144	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	1,883.3	18,833
145	C-042 - Conveyor	N	Outside	N	N/A	N/A	N/A	552.8	5,528
146	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	1,105.7	11,057
147	C-044 - Conveyor Residue	N	Outside	Y	N/A	N/A	N/A	9,165.4	91,654
148	C-044 - Conveyor Residue	N	Outside	Y	N/A	N/A	N/A	113.6	1,136
149	C-045 - Conveyor	N	Outside	Y	N/A	N/A	N/A	9,165.4	91,654
150	C-047 - Conveyor	115.33	N	Outside	H	N/A	A	302.7	3,027
151	C-048 - Conveyor Out of SSI	N	Outside	N	N/A	N/A	A	292.7	2,927
152	C-049 - Conveyor Residue	N	Outside	Y	N/A	N/A	A	3,240.1	32,401
153	C-052 - Conveyor Residue	N	Outside	N	N/A	N/A	A	323.3	3,233
154	C-055 - Conveyor White Zinc	N	Outside	Y	N/A	N/A	A	364.9	3,649
155	C-058 - Conveyor Zinc de-imp	N	Outside	Y	N/A	N/A	A	110.6	1,106
156	C-060 - Conveyor Zinc	N	Outside	Y	N/A	N/A	A	641.3	6,413
157	C-061 - Conveyor Hopper Zinc	1.3%	Outside	N	N/A	N/A	Drop	3,533.8	35,338
158	C-061 - Conveyor Hoppers Zinc drop to stockpile	1.5%	Outside	Y	N/A	N/A	Drop	1,106	1,106
159	C-062 - Conveyor Hoppers	N	Outside	N	N/A	N/A	A	688.7	6,887
160	C-063 - Conveyor Zinc to stockpile	1.5%	Outside	N	N/A	N/A	Drop	995.1	9,951
161	C-063 - Conveyor Hoppers Zinc to stockpile	1.5%	Outside	N	N/A	N/A	Drop	313.1	3,131
162	C-064 - Conveyor Zinc to container	1.5%	Outside	N	N/A	N/A	Drop	258.0	2,580

Row#	Equipment/Streamlining	PM2.5 Emissions		PM2.5 Emissions		PM2.5 Emissions		PM2.5 Emissions	
		ECS Enc. PM4 Control Eff.							
136	C-023 - Collector to Wind Shaker Residue	N	Outside	Y	Wind Shaker	100%	100%	2,686.8	26,868
137	C-024 - Conveyor to Wind Shaker Residue	N	Outside	Y	Wind Shaker	100%	100%	3,686.9	36,869
138	C-038 - Conveyor	N	Outside	Y	N/A	N/A	N/A	2,032.7	20,327
139	C-035 - Conveyor Residue	N	Inside	Y	EC3	100%	80%	596.1	5,961
140	C-039 - Conveyor Non-Ferrous Residue	N	Outside	N	N/A	N/A	N/A	786.9	7,869
141	C-040 - Conveyor Residue	N	Outside	N	N/A	N/A	N/A	1,020.0	10,200
142	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	2,540.0	25,400
143	C-040 - Conveyor Residue	N	Outside	N	N/A	N/A	N/A	1,545.3	15,453
144	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	1,883.3	18,833
145	C-042 - Conveyor	N	Outside	N	N/A	N/A	N/A	552.8	5,528
146	C-043 - Conveyor	N	Outside	N	N/A	N/A	N/A	1,105.7	11,057
147	C-044 - Conveyor Residue	N	Outside	Y	N/A	N/A	N/A	9,165.4	91,654
148	C-044 - Conveyor Residue	N	Outside	Y	N/A	N/A	N/A	113.6	1,136
149	C-045 - Conveyor	N	Outside	Y	N/A	N/A	N/A	9,165.4	91,654
150	C-047 - Conveyor	115.33	N	Outside	H	N/A	A	302.7	3,027
151	C-048 - Conveyor Out of SSI	N	Outside	N	N/A	N/A	A	292.7	2,927
152	C-049 - Conveyor Residue	N	Outside	Y	N/A	N/A	A	3,240.1	32,401
153	C-052 - Conveyor Residue	N	Outside	N	N/A	N/A	A	323.3	3,233
154	C-055 - Conveyor White Zinc	N	Outside	Y	N/A	N/A	A	364.9	3,649
155	C-058 - Conveyor Zinc de-imp	N	Outside	Y	N/A	N/A	A	110.6	1,106
156	C-060 - Conveyor Zinc	N	Outside	Y	N/A	N/A	A	641.3	6,413
157	C-061 - Conveyor Hopper Zinc	1.3%	Outside	N	N/A	N/A	Drop	3,533.8	35,338
158	C-061 - Conveyor Hoppers Zinc drop to stockpile	1.5%	Outside	Y	N/A	N/A	Drop	1,106	1,106
159	C-062 - Conveyor Hoppers	N	Outside	N	N/A	N/A	A	688.7	6,887
160	C-063 - Conveyor Zinc to stockpile	1.5%	Outside	N	N/A	N/A	Drop	995.1	9,951
161	C-063 - Conveyor Hoppers Zinc to stockpile	1.5%	Outside	N	N/A	N/A	Drop	313.1	3,131
162	C-064 - Conveyor Zinc to container	1.5%	Outside	N	N/A	N/A	Drop	258.0	2,580

**Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions**  
**General III, LLC - Chicago, Illinois**

Row #	Equipment Generating Emissions Description	Material Generated	Location	Transfer Point	Transfer Type	Dust Pick-up Point	Dust Capture Eff. (%)	Dust Control Eff. (%)	Emissions		Emissions	
									Control Eff.	ECS Inc. PNA	Control Eff.	ECS Inc. PNA
8	10.9 C-065 Conveyor	Residue	Outside	N	N/A	A	81.0	81.0	0.03065	0.03065	0.03065	0.03065
143	C-065 Conveyor	Residue	Outside	V	N	A	81.0	81.0	0.03065	0.03065	0.03065	0.03065
144	C-065 Conveyor	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
145	C-067 Conveyor	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
146	C-068 Conveyor	Residue	Outside	V	N	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
147	C-070 Conveyor	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
148	C-071 Conveyor	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
149	C-072 Conveyor	Light	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
170	DC-01 flow discharge to lights	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
171	DC-02 flow discharge to lights	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
172	DC-03 flow discharge to lights	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
173	DC-04 flow discharge to lights	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
174	E-01 covered conveyor	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
175	E-02 vibratory batch feeder	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
176	E-03 screener	Residue	Outside	N	Outside	A	20.0	20.0	0.03065	0.03065	0.03065	0.03065
177	E-03 screener	Residue	Outside	V	Inside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
178	E-04 screener	Residue	Outside	V	Inside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
179	E-04 screener	Residue	Outside	V	Inside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
180	E-04 screener	Residue	Outside	V	Inside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
181	E-05 magnetic separation	Residue	Inside	N	Inside	N	ECIS	300%	0.03065	0.03065	0.03065	0.03065
182	E-05 magnetic separation	Residue	Inside	N	Inside	N	ECIS	300%	0.03065	0.03065	0.03065	0.03065
183	E-05 magnetic separation	Ferrite	Inside	N	Inside	N	ECIS	300%	0.03065	0.03065	0.03065	0.03065
184	E-05 magnetic separation	Ferrite	Inside	N	Inside	N	ECIS	300%	0.03065	0.03065	0.03065	0.03065
185	E-06 Eddy Current Separator	Residue	Outside	N	Outside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
186	E-06 Eddy Current Separator	Weld	Outside	N	Outside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
187	E-06 Eddy Current Separator	Zorb	Outside	N	Outside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
188	E-07 Wind Sifter	Lights	Outside	N	Outside	N	NA	NA	0.03065	0.03065	0.03065	0.03065
189	E-07 Wind Sifter	Wheats	Outside	N	Outside	N	NA	NA	0.03065	0.03065	0.03065	0.03065

100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00% 100.00%

Reviewed: 07/27/2018 - 07/27/2018

Table 3-3 - Nonferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Ref#	Equipment/Generating Subprocess	Description	Location / Facility / Vehicle / Container	Transfer Point	Type of Transfer Point	Dust Reduction Capture Eff% Control (%)	Dust Control Eff% Control (%)	Emission Factor Source	Material Throughput Rates		PM Emissions		PM Emissions	
									ton/day	t/t/hr	ton/day	t/t/hr	ton/day	t/t/hr
E-30	Screeener	Residue	Outside	N	Outside	N	N/A	N/A	5,805.0	5,805.0	0.3253	0.3253	0.000358	0.000358
130	E-31	Screeener	Residue	N	Outside	N	N/A	N/A	33,687	33,687	0.0235000 * 0.3398	0.0235000 * 0.3398	0.00031317 *	0.00031317 *
131	E-31	Screeener	Residue	N	Outside	N	N/A	N/A	3,386.7	3,386.7	0.2285	0.2285	0.0003427	0.0003427
132	E-31	Screeener	Residue	N	Outside	N	N/A	N/A	1,548.0	1,548.0	0.0235000 * 0.1955	0.0235000 * 0.1955	0.00031317 *	0.00031317 *
133	E-32	Magnetic Separation	Residue	N	Inside	N	ECG	Eff.	5,480.7	5,480.7	0.0235000 * 0.0283	0.0235000 * 0.0283	0.00031317 *	0.00031317 *
134	E-32	Magnetic Separation	Residue	N	Inside	N	ECG	Eff.	3,637.8	3,637.8	0.0235000 * 0.0259	0.0235000 * 0.0259	0.00031317 *	0.00031317 *
135	E-32	Magnetic Separation	Residue	N	Inside	N	ECG	Eff.	3,143	3,143	0.0235000 * 0.0205	0.0235000 * 0.0205	0.00031317 *	0.00031317 *
136	E-32	Magnetic Separation	Ferrous	N	Inside	N	N/A	N/A	1,842.8	1,842.8	0.0235000 * 0.0130	0.0235000 * 0.0130	0.00031317 *	0.00031317 *
137	E-32	Magnetic Separation	Ferrous	N	Inside	N	N/A	N/A	93.1	93.1	0.0235000 * 0.0001	0.0235000 * 0.0001	0.00031317 *	0.00031317 *
138	E-33	Eddy Current Separator	Residue	N	Outside	N	N/A	N/A	2,255.7	2,255.7	0.0235000 * 0.0184	0.0235000 * 0.0184	0.00031317 *	0.00031317 *
139	E-33	Eddy Current Separator	Waste	N	Outside	N	N/A	N/A	1,280.0	1,280.0	0.0235000 * 0.0118	0.0235000 * 0.0118	0.00031317 *	0.00031317 *
200	E-34	Wind Sifter	Lights	N	Outside	Y	Cover	N	73.7	73.7	0.0235000 * 0.0008	0.0235000 * 0.0008	0.00031317 *	0.00031317 *
201	E-34	Wind Sifter	Residues	N	Outside	Y	Wind Sift	100%	221.1	221.1	0.0235000 * 0.0006	0.0235000 * 0.0006	0.00031317 *	0.00031317 *
202	E-35	Magnetic Separation	Residues	N	Inside	N	ECG	Eff.	3,386.3	3,386.3	0.0235000 * 0.0255	0.0235000 * 0.0255	0.00031317 *	0.00031317 *
203	E-35	Magnetic Separation	Residues	N	Inside	N	ECG	Eff.	3,055.5	3,055.5	0.0235000 * 0.0205	0.0235000 * 0.0205	0.00031317 *	0.00031317 *
204	E-35	Magnetic Separation	Ferrous	N	Outside	N	N/A	N/A	18.4	18.4	0.0235000 * 0.0002	0.0235000 * 0.0002	0.00031317 *	0.00031317 *
205	E-35	Magnetic Separation	Residues	N	Outside	N	N/A	A	3,474	3,474	0.0235000 * 0.0212	0.0235000 * 0.0212	0.00031317 *	0.00031317 *
206	E-36	Eddy Current Separator	Residues	N	Outside	N	N/A	A	2,686.3	2,686.3	0.0235000 * 0.0218	0.0235000 * 0.0218	0.00031317 *	0.00031317 *
207	E-36	Eddy Current Separator	Zebra	N	Outside	N	N/A	A	3,685	3,685	0.0235000 * 0.0250	0.0235000 * 0.0250	0.00031317 *	0.00031317 *
208	E-37	Wind Sifter	Lights	N	Outside	Y	Cover	N	401.7	401.7	0.0235000 * 0.0024	0.0235000 * 0.0024	0.00031317 *	0.00031317 *
209	E-37	Wind Sifter	Residues	N	Outside	Y	Wind Sift	100%	8	8	0.0235000 * 0.0003	0.0235000 * 0.0003	0.00031317 *	0.00031317 *
210	E-38	Magnetic Separation	Residues	N	Inside	N	ECG	Eff.	3,055.5	3,055.5	0.0235000 * 0.0255	0.0235000 * 0.0255	0.00031317 *	0.00031317 *
211	E-39	Magnetic Separation	Ferrous	N	Outside	N	N/A	N/A	15.4	15.4	0.0235000 * 0.0003	0.0235000 * 0.0003	0.00031317 *	0.00031317 *
212	E-39	Magnetic Separation	Residues	N	Outside	N	N/A	A	1,674	1,674	0.0235000 * 0.0012	0.0235000 * 0.0012	0.00031317 *	0.00031317 *
213	E-39	Eddy Current Separator	Zebra	N	Outside	N	N/A	A	3,686	3,686	0.0235000 * 0.0255	0.0235000 * 0.0255	0.00031317 *	0.00031317 *
214	E-40	Eddy Current Separator	Residues	N	Outside	N	N/A	A	1,645.9	1,645.9	0.0235000 * 0.0218	0.0235000 * 0.0218	0.00031317 *	0.00031317 *
215	E-40	Wind Sifter	Lights	N	Outside	Y	Cover	N	493.7	493.7	0.0235000 * 0.0024	0.0235000 * 0.0024	0.00031317 *	0.00031317 *
216	E-40	Wind Sifter	Residues	N	Outside	Y	Wind Sift	100%	8	8	0.0235000 * 0.0003	0.0235000 * 0.0003	0.00031317 *	0.00031317 *

**Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions**  
**General III, LLC - Chicago, Illinois**

Row	Equipment Generating Emissions	Material	Transfer Point	Receptor location (Inside / Outside / Conveyor)	Type of Transfer Pump / Conveyed	Dust Pick-up Controlled Control (%)	Cust Exposure Source (%)	Emissions Rate kg/hr	PM10 Emissions			PM2.5 Emissions			
									ECF Inc. PM10 Control Eff	ECF PM10 Control Eff	ECF Inc. PM10 Control Eff	ECF PM10 Control Eff	ECF Inc. PM10 Control Eff		
235	Non-Moving Transport 25,000 tond/mo							80,000							
236	Aerial Transport 250,000 tpy							94,000							
237	Eddy Current Separator	Rodzide	N	Inside	ECF Conveyed	A	92.1	941	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
238	Magnetic Separation	Ferrous	N	Outside	N	N/A	A	2,635.3	25,353	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *		
239	Eddy Current Separator	Rodzide	N	Outside	N	N/A	A	2,635.3	25,353	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *		
240	Eddy Current Separator	Zorbz	N	Outside	N	N/A	A	3,686	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
241	Magnetic Separation	Rodzide	N	Inside	ECF Conveyed	A	2,414.1	24,141	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
242	Magnetic Separation	Rodzide	N	Inside	ECF Conveyed	A	2,414.1	24,141	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
243	Magnetic Separation	Zorbz	N	Inside	ECF Conveyed	A	2,414.1	24,141	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
244	Eddy Current Separator	Rodzide	N	Outside	N	N/A	A	1,461.3	14,613	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
245	Eddy Current Separator	Rodzide	N	Inside	ECF Conveyed	A	885	885	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000		
246	Separator	Lights Zorbz	N	Outside	N	N/A	A	353.8	3,538	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
247	Separator	Hawks Zorbz	N	Outside	N	N/A	A	1,260	1,260	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
248	Separator	Lights Zorbz	N	Outside	N	N/A	A	350.1	3,501	0.000000 * 0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
249	Separator	Heads	1.5%	Outside	N	N/A	Drop	18.4	184	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
250	Separator	Heads	1.5%	Outside	N	N/A	A	202.7	2,027	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
251	Vibratory Feeder	Out of SSI	N	Outside	N	N/A	A	988.6	988.6	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
252	Eddy Current Separator	Zorbz	1.5%	Inside	N	N/A	Drop	184.3	1,843	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
253	Eddy Current Separator	Rodzide	N	Outside	N	N/A	A	811.9	811.9	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
254	Separator	Heads	N	Outside	N	N/A	A	450.7	4,507	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
255	Separator	Lights Zorbz	N	Outside	N	N/A	A	92.1	92.1	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
256	Separator	Zorbz	N	Outside	N	N/A	A	99.1	99.1	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
257	Separator	Heads	N	Outside	N	N/A	Drop	3,133	3,133	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
258	Separator	Lights Zorbz	N	Outside	N	N/A	A	102.7	1,027	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
259	Separator	Lights Zorbz	N	Outside	N	N/A	Drop	14.7	147	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
260	Transfer Conveyor	Relative	N	Inside	N	ECF To Infeed SSI	A	3,200.6	3,200.6	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
261	Air Pipe	To Infeed SSI	N	Outside	Y	Cover	A	0.000000	0.000000	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000	
262	ECF	Eddy Current Separator	Zorbz	1.5%	Inside	N	N/A	Drop	66.3	66.3	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000
263	ECF	Eddy Current Separator	Zorbz	1.5%	Inside	N	N/A	Drop	66.3	66.3	0.000000 *	0.000000 *	0.000000 *	0.000000 *	0.000000

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**Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions**  
**General III I.U.C - Chicago, Illinois**

Row	Equipment Generating Emissions	Description	Material Generated	Transfer Point Location	Waste/Candidate Y / N	Conveyor / Gondola/ Covered	Transfer Point Location / Gondola/ Covered	Dust Pick-up Control Factor (%)	Dust Pick-up Control Eff. (%)	Emission Factor Source	Material Throughput Rates	PM <sub>10</sub> Emissions				PM <sub>2.5</sub> Emissions					
												ECS Enc. P/M		ECS Enc. P/M Control Eff.		ECS Enc. P/M		ECS Enc. P/M Control Eff.			
												% Red./Inc.	Amt. Throughput	DCP/M	Eff. %	DCP/M	Eff. %	DCP/M	Eff. %		
243	SC-303	Drop ASR into Feed	Residue	Outside	N	Exchangers	Exchangers	0	25,800.0	0.0001063 *	0.0264	0.0001063 *	0.0213	0.0001063 *	0.0264	0.0001063 *	0.0213	0.0001063 *	0.0264	0.0001063 *	
244	Lester	Transfer hopper	Residue	Inside	N	Waste	Waste	0	20,046.6	0.0001064	0.0111	0.0210	0.0001065	0.0110	0.0210	0.0001065	0.0110	0.0210	0.0001065	0.0110	0.0210
245	End	Load waste to truck	Residue	Outside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
246	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
247	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
248	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
249	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
250	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
251	SC-303	Supplemental Conveyor	Residue	Inside	N	Supplemental Conveyor	Supplemental Conveyor	0	5,025.0	0.0001060	0.0473	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287	0.0001061	0.0312	0.0287
												Ratio of PM <sub>10</sub> metal to total PM from June 2018 emission test of 108									
												sources after applied to transferhouse plant PM emissions.									

\* Material moisture content (% for right materials - AP-42, Table 13.2-4) for crushed limestone - tonnare.

b Uncontrolled emission factor calculated according to material drop equation in AP-42, Section 13.3.3. Emissions calculated with control eff. factor included for sources being treated.

c Uncontrolled emission factor calculated according to material drop equation in AP-42, Section 13.3.3.

d Uncontrolled particulate matter emission factors from AP-42, Table 11.9-2.1 for screening. If moisture is greater than 1.0% by weight, use controlled emission factors.

e Uncontrolled particulate matter emission factors from AP-42, Table 11.9-2.1 for screening. If moisture is greater than 1.0% by weight, use controlled emission factors.

f Sources located inside the Flores Building come to atmosphere through Duct Collector DC-01. Emissions are estimated by multiplying the Duct air flow rate of 13,100 cfm by a static load loss of 0.025 kg/dscf.

g Estimated total metal PM<sub>10</sub> emissions rates expressed as a percent of estimated PM<sub>10</sub> emissions from Non-Ferrous material handling.

h Sources after applied to transferhouse plant PM emissions.

Table 3-3 - Non-Ferrous Material Processing - Particulate Emissions  
General III, LLC - Chicago, Illinois

Row #	Equipment Generating Emissions ID #	Description	Material Conveyed	Moisture > 1.5%	Transfer Point Location (Inside / Outside)	Type of Transfer Point Controlled (N/A)	User Process Control Efficiency (%)	Material Throughput Rates ton/hr	Emission Factor Source	ECS Enc. PM Control Eff.		DCP PM Control Eff.		DCP PM <sub>10</sub> Control Eff.	
										Annual Throughput ton/yr	ECS Enc. PM Control Eff.	DCP PM Control Eff.	DCP PM <sub>10</sub> Control Eff.	ECS Enc. PM <sub>10</sub> Control Eff.	DCP PM <sub>10</sub> Control Eff.
Max Material Throughput 25,000 ton/hrs										25,000	80.0%	99.9%	99.9%	80.0%	99.9%

### Material Drop PM Equations (AP-42, Section 13.

$$E = k \times (0.0032) \times \frac{(L/S)^{1.3}}{[M/2]^{1.4}}$$

k = particle size multiplier (dimensionsless);

L = mean wind speed;

https://www2.epa.gov/sites/od/intro/airmore.htm

M = material moisture content (%).

D = 5.0 MPH - annual average wind speed for Chicago (Midway Airport)

k = 0.74 AP-42, Section 13.2.6, for particle size < 10 um

PM = AP-42, Section 13.2.6, for particle size < 10 um

PM = AP-42, Section 13.2.6, for particle size < 2.5 um

% for light materials - AP-42, Table 13.1-4.1 for crushed limestone - (conservative)

The material moisture content for stockpile drop emission calculations varies by material - see Column 2 above.

### Summary of Non-Ferrous Material Processing System Emission Points and Emissions by Emission Factor Type

# of Proc. Emission Points	Process Rate ton/yr	PM Emissions		PM <sub>10</sub> Emissions		PM <sub>2.5</sub> Emissions	
		Factor ton/ton	Factor ton/ton	Factor ton/ton	Factor ton/ton	Factor ton/ton	Factor ton/ton
8							
8	118,876	3,988.73 <sup>1</sup>	4.0030	0.4324	4.3329	0.0011	0.1569
9	Conveyor Transfer Points						
11	Uncontrolled	57,218	572.33	0.009314	0.00236	0.009346	0.000212
13	Controlled	13,670	136.702	0.0259	0.1769	0.0287	0.021317
13	Screening - Uncontrolled	42,209	422.095	0.0022	0.0414	0.0074	0.00946
12	Screening - Controlled	45,847	458.466	0.000268	0.0067	0.0069	0.01319
2	Truck Loadout	23,338	233.378	Varies	0.0058	0.051	0.0023
13	Stockpile Dross	Total Emissions	0.75	7,400	Varies	0.0406	0.4058
					6.20	2.76	0.04
						0.43	1.44
						0.14	0.14

**Table 3-4 - Summary of Estimated Fugitive Particulate Emissions from Stockpile Operations<sup>a</sup>**  
**General III, LLC - Chicago, Illinois**

Plant	Stock Pile	Stock Pile Area Acres	Control Factor <sup>b</sup>	No of Active Days day/yr <sup>c</sup>	Inactive Emissions			Active Emissions			Total PM Emissions			
					PM tpy <sup>d,h</sup>	PM10 tpy <sup>d,h</sup>	PM2.5 tpy <sup>d,h</sup>	PM tpy <sup>d,h</sup>	PM10 tpy <sup>d,h</sup>	PM2.5 tpy <sup>d,h</sup>	PM tpy <sup>d,h</sup>	PM10 tpy <sup>d,h</sup>	PM2.5 tpy <sup>d,h</sup>	
Ferrous Plant	Poker North	0.0115	0.33	312	0.0004	0.0002	0.0000	0.0078	0.0039	0.0006	0.0082	0.0041	0.0006	
	Poker South	0.0115	0.33	312	0.0004	0.0002	0.0000	0.0078	0.0039	0.0006	0.0082	0.0041	0.0006	
	ASR	0.2541	1.00	312	0.0236	0.0118	0.0018	0.5232	0.2616	0.0396	0.5468	0.2734	0.0414	
	Ferrous North	0.3630	1.00	312	0.0337	0.0169	0.0026	0.7475	0.3738	0.0566	0.7812	0.3907	0.0592	
	Ferrous South	0.3630	1.00	312	0.0337	0.0169	0.0026	0.7475	0.3738	0.0566	0.7812	0.3907	0.0592	
	Fluff (Bin)	0.0161	0.33	312	0.0005	0.0003	0.0000	0.0109	0.0055	0.0008	0.0114	0.0058	0.0008	
	Raw Material Truck Dumping (Drop 1)	0.3630	1.00	312	0.0337	0.0169	0.0026	0.7475	0.3738	0.0566	0.7812	0.3907	0.0592	
	Raw Material Movement from Truck Dumping Area to Stockpile (Drop 2)	0.1815	1.00	312	0.0168	0.0084	0.0013	0.3737	0.1869	0.0283	0.3905	0.1953	0.0295	
	Total											3.4834	1.7425	0.2635
Nonferrous Plant	PE from E-02	0.0047	0.33	312	0.0003	0.0001	0.0000	0.0032	0.0016	0.0003	0.0033	0.0017	0.0002	
	5" + Zorba	0.0189	0.33	312	0.0006	0.0003	0.0000	0.0128	0.0064	0.0010	0.0134	0.0067	0.0010	
	2-1/2" - 5" Zorbs	0.0189	0.33	312	0.0006	0.0003	0.0000	0.0128	0.0064	0.0010	0.0134	0.0067	0.0010	
	5/8" - 2-1/2" Zorbs	0.0189	0.33	312	0.0006	0.0003	0.0000	0.0128	0.0064	0.0010	0.0134	0.0067	0.0010	
	Tailings	0.0195	0.33	312	0.0006	0.0003	0.0000	0.0133	0.0067	0.0010	0.0139	0.0070	0.0010	
	Open	0.0195	0.33	312	0.0006	0.0003	0.0000	0.0133	0.0067	0.0010	0.0139	0.0070	0.0010	
	Wire	0.0195	0.33	312	0.0006	0.0003	0.0000	0.0133	0.0067	0.0010	0.0139	0.0070	0.0010	
	Wire Rich Solids	0.0195	0.33	312	0.0006	0.0003	0.0000	0.0133	0.0067	0.0010	0.0139	0.0070	0.0010	
	Zurick	0.0195	0.33	312	0.0006	0.0003	0.0000	0.0133	0.0067	0.0010	0.0139	0.0070	0.0010	
	Waste	0.0868	0.33	312	0.0027	0.0014	0.0002	0.0590	0.0295	0.0045	0.0617	0.0309	0.0047	
Totals												3.4834	1.7425	0.2635

a. Stockpile emissions calculation from TCEQ for crushed stone downloaded August 2019.

[http://www.tceq.state.tx.us/air/permits/stockpile/rock\\_crushing\\_emissions.htm](http://www.tceq.state.tx.us/air/permits/stockpile/rock_crushing_emissions.htm)

3.3087

b. Control Factor of 0.33 (67.5% control) for partial enclosure consisting of walls on three sides of bin. Control Factor of 1.0 for no control.

0.1747

c. Assume number of active days to be 6 days per week and 52 weeks per year and inactive days to be 1 day per week and 52 weeks per year.

3.4834

d. From TCEQ Guidance

Stockpile emission calculation:

$$\text{PM Emission Rate (tpy)} = \frac{[(\text{inactive day PM EF} \times \text{No. of inactive days}) \times \text{stockpile area}/2000] \times \text{control factor}}{[(\text{active day PM EF} \times \text{No. of active days}) \times (\text{stockpile area}/2000) \times \text{control factor}]}$$

Inactive Day PM Emission Factor = 3.50 lb-PM/acre-day from TCEQ rock crushing emission calculation spreadsheet.

Active Day PM Emission Factor = 13.20 lb-PM/acre-day from TCEQ rock crushing emission calculation spreadsheet.

e. PM10 emissions are half of PM emission per TCEQ Air Permits Division, Rock Crushing Emission Calculation spreadsheet.

f. Where PM2.5 emission factors are not provided in AP-42, 11.19.2-2, a ratio of aerodynamic particle size multipliers from AP-42, 13.2.45 is used to estimate PM2.5 emission factors. PM2.5 EF = (PM10 EF/0.35) x .0053.

g. Total particulate emissions is the sum of inactive day emissions plus active day emissions.

h. Hourly emissions, if required, would be based on 8,760 hr/yr.

Control Method	Control Eff. (%)	Control Factor (1 - ctrl eff)
None	0	1
Wet material	50	0.5
Water	70	0.3
Chemicals/foam	80	0.2
Partial Enclosure <sup>g</sup>	50-85 x average of 67.5	0.5-0.15 x average of 0.33
Full enclosure <sup>g</sup>	90	0.1
Enclosed by building <sup>g</sup>	90	0.1
Washed Sand/gravel	95	0.05
Washed Sand/gravel with water spray	98.5	0.015
Manufacturer Rating	0	0

**Table 3-5A - Fugitive PM Emissions - Paved Roads**  
**General III, LLC - Chicago, Illinois**

**Paved Road Fugitive Emission Calculation Procedure**

$$E_{ext} = (k * (sl)^{0.91} * (W)^{1.02}) * (1 - (P/(4N)))$$

equation does not include brake and tire wear.

where:

$E_{ext}$ =	Size specific annual average particulate emission factor (lb/VMT)
$k$ =	See Below Particle size multiplier lb/VMT (AP-42 Table 13.2.1-1)
$sl$ =	9.7 mean controlled silt content, % (AP42 Table 13.2.1-3 Jan 2011 - Iron & Steel Range: 0.09 to 79; mean 9.7-g/m <sup>2</sup> )
$W$ =	See Below Mean vehicle weight , tons (use weighted average where available)
$P$ =	120 Number of precipitation days (>0.01 in) per year (AP42 Fig 13.2.1.2 Jan 2011 - Chicago, IL)
$N$ =	365 Averaging Period, annual
Control Eff % =	75.00% Emission Control Efficiency for sweeping or watering
Daily Operating Hours	18 Hours per Year
Weekly Operating Days	6 Days /Week
Annual Operating Weeks =	52 Weeks/Year
Annual Operating hours =	5,616 Hours per Year

**Material Hauling**

Vehicle Type	Mean Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM <sub>10</sub> Particle size multiplier (k) = 0.011		Annual PM Emissions tpy
					Annual Average Controlled Emissions (lb/day)	(ton/month)	
Peddler Scrap Deliveries	3.45	133.23	0.2823	0.0706	9.406	0.147	1.47
Truck Scrap Delivery to North Scrap Stockpile	24.50	23.24	2.0848	0.5212	12.113	0.189	1.89
Truck Scrap Delivery to South Scrap Stockpile	24.50	39.99	2.0848	0.5212	20.844	0.325	3.25
Ferrous Scrap Shipment from North Stockpile	26.75	14.34	2.2802	0.5701	8.173	0.128	1.28
Ferrous Scrap Shipment from South Stockpile	26.75	21.20	2.2802	0.5701	12.089	0.189	1.89
Ferrous Waste Shipped Off Site by Truck	27.75	0.29	2.3672	0.5918	0.170	0.003	0.03
Non Ferrous Products Shipped Off Site by Truck	26.75	1.25	2.2802	0.5701	0.714	0.011	0.11
Non Ferrous Waste Shipped Off Site by Truck	27.75	9.72	2.3672	0.5918	5.752	0.090	0.90
WA500 Loaders	36.49	10.45	3.1302	0.7826	8.178	0.128	1.28
WA300 Loaders	16.60	4.75	1.4015	0.3504	1.664	0.026	0.26
Weighted Average Weight:	14.44	Subtotals:			79.104	1.234	12.34

**Material Hauling**

Vehicle Type	Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM <sub>10</sub> Particle size multiplier (k) = 0.0022		Annual PM <sub>10</sub> Emissions tpy
					Annual Average Controlled Emissions (lb/day)	(ton/month)	
Peddler Scrap Deliveries	3.45	133.23	0.0565	0.0141	1.879	0.029	0.29
Truck Scrap Delivery to North Scrap Stockpile	24.50	23.24	0.4170	0.1043	2.424	0.038	0.38
Truck Scrap Delivery to South Scrap Stockpile	24.50	39.99	0.4170	0.1043	4.171	0.065	0.65
Ferrous Scrap Shipment from North Stockpile	26.75	14.34	0.4560	0.1140	1.634	0.026	0.26
Ferrous Scrap Shipment from South Stockpile	26.75	21.20	0.4560	0.1140	2.417	0.038	0.38
Ferrous Waste Shipped Off Site by Truck	27.75	0.29	0.4734	0.1184	0.034	0.001	0.01
Non Ferrous Products Shipped Off Site by Truck	26.75	1.25	0.4560	0.1140	0.143	0.002	0.02
Non Ferrous Waste Shipped Off Site by Truck	27.75	9.72	0.4734	0.1184	1.151	0.018	0.18
WA500 Loaders	36.49	10.45	0.6260	0.1565	1.635	0.026	0.26
WA300 Loaders	16.60	4.75	0.2803	0.0701	0.333	0.005	0.05
Weighted Average Weight:	14.44	Subtotals:			15.821	0.247	2.47

**Material Hauling**

Vehicle Type	Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM <sub>2.5</sub> Particle size multiplier (k) = 0.00054		Annual PM <sub>2.5</sub> Emissions tpy
					Annual Average Controlled Emissions (lb/day)	(ton/month)	
Peddler Scrap Deliveries	3.45	133.23	0.0139	0.0035	0.466	0.007	0.07
Truck Scrap Delivery to North Scrap Stockpile	24.50	23.24	0.1023	0.0256	0.595	0.009	0.09
Truck Scrap Delivery to South Scrap Stockpile	24.50	39.99	0.1023	0.0256	1.024	0.016	0.16
Ferrous Scrap Shipment from North Stockpile	26.75	14.34	0.1119	0.0280	0.401	0.006	0.06
Ferrous Scrap Shipment from South Stockpile	26.75	21.20	0.1119	0.0280	0.594	0.009	0.09
Ferrous Waste Shipped Off Site by Truck	27.75	0.29	0.1162	0.0291	0.008	0.000	0.00
Non Ferrous Products Shipped Off Site by Truck	26.75	1.25	0.1119	0.0280	0.035	0.001	0.01
Non Ferrous Waste Shipped Off Site by Truck	27.75	9.72	0.1162	0.0291	0.283	0.004	0.04
WA500 Loaders	36.49	10.45	0.1537	0.0384	0.401	0.006	0.06
WA300 Loaders	16.60	4.75	0.0688	0.0172	0.082	0.001	0.01
Weighted Average Weight:	14.44	Subtotals:			3.889	0.061	0.61

**Table 3-5B - Fugitive PM Emissions - Unpaved Roads**  
**General III, LLC - Chicago, Illinois**

**Unpaved Industrial Road Fugitive Emission Calculation Procedure**

5% of loader miles are assumed to be on unpaved roads

$$E_{ex} = [(k * (s/12)^a * (W/3)^b) * (N-P)/N]$$

Equation 1a & 2, AP-42 13.2.2-2 (Nov 2006)

where:

$E_{ex}$ =	Size specific annual average particulate emission factor (lb/VMT)	
$k$ =	See Below	Particle size multiplier lb/VMT (AP-42 Table 13.2.2-2)
$s$ =	6	mean material silt content (%) (AP42 Table 13.2.2-1 Nov 2006 - Iron & Steel Production: mean = 6.0%)
$W$ =	See Below	Mean vehicle weight, tons (use weighted average where available)
$P$ =	120	Number of precipitation days (>0.01 in) per year (AP42 Fig 13.2.1.2 Jan 2011 - Chicago, IL)
$N$ =	365	Averaging Period, annual
Control Eff % =	50.00%	Emission Control Efficiency for watering
Daily Operating Hours	18	Hours per Year
Weekly Operating Days	6	Days /Week
Annual Operating Weeks =	52	Weeks/Year
Annual Operating hours =	5,616	Hours per Year
(AP42 Table 13.2.2-2 Nov 2006 - Industrial Roads [Eq. 1a])		
EQ 1a Constants		
$a$ =	0.7	PM
$b$ =	0.45	PM10
	0.45	PM2.5

**Material Hauling**

Vehicle Type	Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM		Particle size multiplier (k) =	4.9		
					Annual Average Controlled Emissions					
					(lb/day)	(ton/month)				
WA500 Loaders	36.49	0.55	6.2323	3.1162	1.714	0.027	0.27			
WA300 Loaders	16.60	0.25	4.3721	2.1861	0.547	0.009	0.09			
Weighted Average Weight:	30.28	Subtotals:			2.260	0.035	0.35			

**Material Hauling**

Vehicle Type	Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM <sub>10</sub>		Particle size multiplier (k) =	1.5		
					Annual Average Controlled Emissions					
					(lb/day)	(ton/month)				
WA500 Loaders	36.49	0.55	1.5609	0.8305	0.457	0.007	0.07			
WA300 Loaders	16.60	0.25	1.1651	0.5826	0.146	0.002	0.02			
Weighted Average Weight:	30.28	Subtotals:			0.602	0.009	0.09			

**Material Hauling**

Vehicle Type	Vehicle Weight (tons)	Miles Traveled per Day	Uncontrolled lb/VMT	Controlled lb/VMT	PM <sub>2.5</sub>		Particle size multiplier (k) =	0.15		
					Annual Average Controlled Emissions					
					(lb/day)	(ton/month)				
WA500 Loaders	36.49	0.55	0.1651	0.0831	0.045	0.001	0.01			
WA300 Loaders	16.60	0.25	0.1165	0.0583	0.015	0.000	0.00			
Weighted Average Weight:	30.28	Subtotals:			0.060	0.001	0.01			

**Table 3-6 Miscellaneous Natural Gas Fired Environmental Heaters**  
**General III, LLC - Chicago, Illinois**

Pollutant	Pollutant Emission Factor <sup>a</sup> lb/MMscf	10 Total Max Firing Rate 10.0 MMBtu/hr NG HHV = 1,020-Btu/scf Annual Gas Consumption 65,700 MMBtu/yr	
		ton/mo <sup>b</sup>	tpy
Nitrogen Oxide (NOx)	100	0.32	3.22
Carbon Monoxide (CO)	84	0.27	2.71
Total Filterable PM	1.9	0.01	0.06
Total Condensable PM	5.7	0.02	0.18
Total Particulate Matter	7.6	0.02	0.24
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.00	0.02
Volatile Organic Compounds (VOC)	5.5	0.02	0.18
<b>Greenhouse Gas Emissions</b>			
Carbon Dioxide (CO <sub>2</sub> )	120,174	387.03	3,870.31
Methane (CH <sub>4</sub> )	2.2649	0.0073	0.07
Nitrous Oxide (N <sub>2</sub> O)	0.2265	0.0007	0.01
<b>Carbon Dioxide Equivalents (CO<sub>2</sub>e)<sup>c</sup></b>		<b>387.43</b>	<b>3,874.31</b>

a. AP-42 Emission factors from Tables 1.4-1 and 1.4-2.

b. Unit heaters are estimated to operate 6,570 hr/year.

c. Global Warming Potentials (GWP) for CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O are 1, 25, and 298 respectively (40 CFR 98 Subpart A).

**Table 3-6 Miscellaneous Natural Gas Fired Environmental Heaters**  
**General III, LLC - Chicago, Illinois**

**Summary of HAP Emissions from Natural Gas Combustion**

HAP <sup>b</sup> Y/N	Pollutant	Emission Factor <sup>a</sup> (lb/10 <sup>6</sup> scf)		
			ton/mo	tpy
<b>Metal HAPs<sup>c</sup></b>				
Y	Lead	0.0005	1.61E-06	1.61E-05
Y	Manganese	3.80E-04	1.22E-06	1.22E-05
Y	Mercury	2.60E-04	8.37E-07	8.37E-06
Y	Nickel	2.10E-03	6.76E-06	6.76E-05
Y	Arsenic	2.00E-04	6.44E-07	6.44E-06
Y	Beryllium	< 1.20E-05	3.86E-08	3.86E-07
Y	Cadmium	1.10E-03	3.54E-06	3.54E-05
Y	Chromium	1.40E-03	4.51E-06	4.51E-05
Y	Cobalt	8.40E-05	2.71E-07	2.71E-06
Y	Selenium	< 2.40E-05	7.73E-08	7.73E-07
<b>Volatile HAPs<sup>d</sup></b>				
Y	Toluene	3.40E-03	1.10E-05	1.10E-04
Y	Hexane	< 1.80E+00	< 5.80E-03	< 5.80E-02
Y	Anthracene	< 2.40E-06	< 7.73E-09	< 7.73E-08
Y	Pyrene	5.00E-06	1.61E-08	1.61E-07
Y	Benzo(g,h,i)perylene	< 1.20E-06	< 3.86E-09	< 3.86E-08
Y	Indeno(1,2,3-cd)pyrene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Acenaphthylene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Benzo(b)fluoranthene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Fluoranthene	3.00E-06	9.66E-09	9.66E-08
Y	Benzo(k)fluoranthene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Chrysene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Dichlorobenzene	1.20E-03	3.86E-06	3.86E-05
Y	Formaldehyde	7.50E-02	2.42E-04	2.42E-03
Y	Benzo(a)pyrene	< 1.20E-06	< 3.86E-09	< 3.86E-08
Y	Dibenzo(a,h)anthracene	< 1.20E-06	< 3.86E-09	< 3.86E-08
Y	3-Methylcholanthrene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Benz(a)anthracene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	7,12-Dimethylbenz(a)anthracene	< 1.60E-05	< 5.15E-08	< 5.15E-07
Y	Benzene	< 2.10E-03	< 6.76E-06	< 6.76E-05
Y	Acenaphthene	< 1.80E-06	< 5.80E-09	< 5.80E-08
Y	Phenanathrene	1.70E-05	5.48E-08	5.48E-07
Y	Fluorene	2.80E-06	9.02E-09	9.02E-08
Y	Naphthalene	6.10E-04	1.96E-06	1.96E-05
Y	2-Methylnaphthalene	2.40E-05	7.73E-08	7.73E-07
<b>Total HAPs</b>			<b>6.08E-03</b>	<b>6.08E-02</b>
<b>Maximum Individual HAP</b>			<b>5.80E-03</b>	<b>5.80E-02</b>

a. AP-42 Emission factors from Tables 1.4-1 and 1.4-2.

b. Hazardous Air Pollutant (HAP) as defined by Section 112(b) of the Clean Air Act.

c. Metal HAP emission factors from natural gas combustion - AP-42 Emission factors from Tables 1.4-4.

d. Organic HAP emission factors from natural gas combustion - AP-42 Emission factors from Tables 1.4-3.

e. Monthly emissions are assumed to be 10% of annual emissions.

**Table 3-7 - Summary of Facility Wide Criteria Pollutant Emissions**  
**General III, LLC - Chicago, Illinois**

Pollutant	RTO <sup>a</sup>			Natural Gas <sup>b</sup>			Ferrous Plant <sup>c</sup>			Nonferrous Plant <sup>d</sup>			Misc.			Natural Gas <sup>e</sup>			Facility Wide Potential <sup>f</sup>			Fugitive Emissions From Stockpile Operations <sup>g</sup>			Fugitive Emissions from Paved/Unpaved Roads <sup>h</sup>			Facility Wide Emissions with Fugitives tpy			
	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp	ton/mo	ton/mo	tpp		
Oxides of Nitrogen - NOx		0.26	2.57									0.32	3.22	5.79													5.79				
Carbon Monoxide - CO	1.29	12.86	0.22	2.16								0.32	2.71	17.72													17.72				
Total Particulate Matter - PM1	0.94	9.40	0.02	0.20	0.30	2.93	0.89	8.84			0.24	21.61	0.35	3.48	1.27	12.69										37.79					
filterable PM less than 10 microns in diameter - PM <sub>10</sub>	0.94	9.40	0.02	0.20	0.13	1.25	0.42	4.21	0.00	0.24	15.30	0.17	1.74	0.26	2.56	19.60															
filterable PM less than 2.5 microns in diameter - PM <sub>2.5</sub>					0.02	0.20	0.23	0.19	1.85	0.00	0.24	2.52	0.03	0.26	0.62	3.40															
Sulfur Dioxide - SO <sub>2</sub>									0.02						0.00	0.03											0.03				
Volatile Organic Material - VOC	0.51	5.12		0.14											0.02	0.18	5.44											5.44			
Total HAPs	0.2573	2.5733	0.0049	0.0485	0.0015	0.0243	0.0074	0.0730	0.0063	0.0628	2.7700	0.0021	0.0210	0.0028	0.0221	2.8191															
Max Individual HAP		1.5442		0.0463	0.0069	0.0417			0.0580		0.0108	0.0098																			
HAP			HCl		Heptane		Lead																								
Hexane				0.0463					0.0000	0.0580	0.1043																				
Greenhouse Gas Emissions																															
Carbon Dioxide - CO <sub>2</sub>		3,085.91		3,092.72																							10,058.94				
Methane - CH <sub>4</sub>		0.0583		0.0583																							0.1395				
Nitrous Oxide - N <sub>2</sub> O		0.0058		0.0058																							0.0190				
Carbon Dioxide Equivalents - CO <sub>2</sub> e		3,089.10		3,095.91																							10,069.33				

a. See Tables 3-1A (VOC and CO), Table 3-1B (PM), and Table 3-1C (HAPs). For the purposes of this application, GHG from combustion of VOC in the RTO is assumed to be equal to GHG from maximum natural gas combustion in RTO.

b. See Table 3-10.

c. See Table 3-2.

d. See Table 3-3.

e. See Table 3-4.

f. See Table 3-5.

g. See Table 3-6.

h. Scrap metal recycling is not one included in one of the 28 industrial quantities identified in PSD rules; therefore for purposes of PSD, fugitive emissions are not included in PSD.

Table 3-8 - Summary of Facility Wide HAP Emissions  
General III, LLC - Chicago, Illinois

Hazardous Air Pollutant	RTC <sup>a</sup>		Hazardous Gas <sup>b</sup>		Ferrous Plant <sup>c</sup>		Nonferrous Plant <sup>c</sup>		Stackside Operations <sup>d</sup>		Fugitive Road <sup>d</sup>		Paved + Unpaved		Misc.		Natural Gas <sup>e</sup>		Facility Wide HAP	
	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo	tess/mo	kg/mo
<b>Vehicle HAPs</b>																				
Ethylbenzene	1.33E-03	1.33E-03																	1.33E-03	
Styrene	2.68E-05	2.68E-04																	2.68E-04	
Toluene	6.68E-04	5.68E-03	2.75E-05	2.75E-05														6.68E-03		
Hexane			4.63E-03	4.63E-02														1.64E-02	1.64E-02	
Amylbenzene			6.18E-09	6.18E-08														1.39E-08	1.39E-07	
Tetrachloroethane (PCP)	5.34E-06	5.34E-05																5.34E-06	5.34E-05	
Pentene			1.28E-06	1.28E-07														2.89E-07		
m,p-Xylene	2.68E-05	2.68E-04																2.68E-04		
Benzene (b)iphenyl			3.09E-09	3.09E-08														3.09E-08	3.09E-08	
Indeno(1,2,3- <i>cd</i> )perylene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Acenaphthene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Benz(a)fluoranthene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Fluoranthene			7.72E-09	7.72E-08														9.66E-09	9.66E-08	
Benz(e)fluoranthene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Chrysene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Dichlorobenzene			3.09E-06	3.09E-05														5.80E-06	5.80E-05	
Formaldehyde			1.93E-04	1.93E-03														6.95E-04	6.95E-03	
Benzaldehyde			3.09E-09	3.09E-08														3.09E-09	3.09E-08	
Debenzylideneacetone			3.09E-09	3.09E-08														3.09E-09	3.09E-08	
3-Methylphenanthrene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Benzalanthracene			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
7,12-Dimethylbenzeneisoprenes			4.63E-09	4.63E-08														5.80E-09	5.80E-08	
Benzene	8.00E-06	8.00E-05															5.18E-07	5.18E-07		
3,3,1-Trichloroethane			5.40E-06	5.40E-05													6.76E-06	6.76E-05		
Methylene Chloride	1.20E-04	1.20E-03																4.08E-04		
Trichloroethylene (TCE)			1.33E-03	1.33E-02														1.20E-03	1.20E-03	
Acenaphthylene			4.63E-09	4.63E-08														3.09E-08	3.09E-08	
Phenanthrene			4.39E-06	4.39E-05														5.80E-06	5.80E-05	
Fluorene			7.21E-09	7.21E-08														5.18E-07	5.18E-07	
Naphthalene			1.57E-06	1.57E-05														9.12E-06	9.12E-05	
2-Methylnaphthalene			6.18E-08	6.18E-07														4.08E-07	4.08E-07	
o-Xylene			1.33E-04	1.33E-03														1.33E-04	1.33E-03	
Metal HAPs																				
Lead	2.77E-04	2.77E-03																1.61E-05	1.61E-05	
Manganese	3.98E-04	3.98E-03	9.78E-07	9.78E-06														7.12E-03	7.08E-02	
Mercury	8.93E-05	8.93E-02	6.69E-07	6.69E-06														3.95E-03	3.95E-02	
Nickel	6.59E-04	6.59E-03	5.40E-05	5.40E-04														8.95E-02	8.95E-02	
Antimony	2.28E-04	2.28E-03	3.49E-07	3.49E-06														2.28E-04	2.28E-04	
Arsenic	7.54E-05	7.54E-04	5.15E-07	5.15E-06														6.44E-06	6.44E-06	
Beryllium	1.79E-05	1.79E-04	3.08E-08	3.08E-07														8.95E-04	8.95E-04	
Cadmium	8.51E-05	8.51E-04	2.83E-06	2.83E-05														2.71E-05	2.71E-05	
Chromium	6.90E-04	6.90E-03	3.62E-05	3.62E-04														1.52E-04	1.49E-03	
Cobalt	2.33E-05	2.33E-04	2.16E-07	2.16E-06														1.62E-03	1.62E-03	
Phosphorus	2.49E-02	2.49E-01	1.05E-04	1.05E-03														1.12E-04	1.12E-04	
Selenium	1.21E-03	1.21E-02	6.18E-08	6.18E-07														2.59E-03	2.59E-03	
<b>Organic Acid HAPs</b>																				
Hydrochloric Acid	1.54E-01	1.54E-00																1.54E-01	1.54E-00	
Hydrofluoric Acid	6.35E-02	6.35E-01	4.86E-03	4.86E-02														6.35E-01	6.35E-01	
Total HAPs	2.57E-01	2.57E-00															2.82E-01	2.82E-00		
<b>Maximum Individual HAP</b>																				

a. Unemulated organic compound emission factors (bifactor), as presented in B18. V applicability Worksheet, Table D-11b, were multiplied by proposed permit throughput limits, reflected for 90% control by the RTC. Actual HAP emission factors were taken from the November 2012 emission testing of the RTC at GIL LLC in Chicago, Illinois.

b. HAP emissions from individual gas contribution as identified in AP-42, Table 2-5, 1995 & 2005.

c. Total HAP emissions calculated by multiplying the weight of a metal HAP to its particulate emission by the total HAP emissions from identified emission unit.

d. HAP emission factors from natural gas combustion from AP-42, Tables 1-4-3 and 1-4-4 adjusted to propane on the basis of 1,020 hours (see Footnotes on Table 5).



**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility**

**General III, LLC  
11600 South Burley  
Chicago, Illinois 60614**

**January 27, 2020**

**APPENDIX D**

**SHREDDER RTO/SCRUBBER EMISSIONS TEST REPORT  
(TESTING PERFORMED NOVEMBER 2019)**

**HARD COPY of This Document Contains a CD ROM with the above referenced test report.**





**Updated Emission Estimates  
Construction Permit Application 19090021 for a  
New Scrap Metal Recycling Facility**

**General III, LLC  
11600 South Burley  
Chicago, Illinois 60614**

**January 27, 2020**

**APPENDIX E**

**PROPOSED CHANGES TO  
CONDITION 11 (EMISSION LIMITS) OF  
CONSTRUCTION PERMIT 19090021**

1980-1981  
1981-1982  
1982-1983  
1983-1984  
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2098-2099  
2099-20100

January 27, 2020; Note from John Finley of RRA:

The changes identified herein correspond to the updated emission estimates submitted to TEFRA dated January 22, 2020. The values below should be included in the draft final construction permit.

- iii. Emissions from and operation of the Hammermill Shredder System shall not exceed the following limits:

i. VOM emissions:

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emission Factor (lb/Ton)	VOM Emission (Tons/Mo)	VOM Emission (Tons/Yr)
Hammermill Shredder RTO/Scrubber Stack	100,000	1,000,000	0.9119243	0.9124	9.122e-04

These limits are based upon maximum shredder material throughput, an uncontrolled emission factor derived from a stack test, and 98% removal efficiency by the RTO/Scrubber. All measured total hydrocarbon (THC) emissions are assumed to be VOM.

ii. HAP emissions:

Emission Unit	Single HAP (Tons/Mo)	Single HAPs (Tons/Yr)	Combined HAPs (Tons/Mo)	Combined HAPs (Tons/Yr)
Metal Shredder RTO/Scrubber Stack	0.150-03	1.540-30	0.270-06	2.630e-04

Commented [RRA]: Hydrochloric acid (HCl) at scrubber outlet from November 2019 emission testing with safety factor of 4 included.

These limits are based upon measured emission rates from a stack test adjusted by safety factor of 4.0 at maximum shredder material throughput in Condition 11(a)(i) above, combined HAPs comprising 33% of the total emissions and by single HAP emissions no more than 30% greater than combined HAP emissions.

iii. Filterable PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions:

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emission Factor (lb/Ton)	PM, PM <sub>10</sub> , and PM <sub>2.5</sub> Emissions (Tons/Mo)	PM, PM <sub>10</sub> , and PM <sub>2.5</sub> Emissions (Tons/Yr)
Metal Shredder RTO/Scrubber Stack	100,000	1,000,000	0.0047	0.9436	9.432e-06

These limits are based upon maximum shredder material throughput, emission factors derived from stack test adjusted by a safety factor of 4.0 captured and measured filterable PM emissions, and all measured filterable PM assumed to be PM<sub>10</sub> and PM<sub>2.5</sub>.

- b. Emissions from fuel combustion in the Regenerative Thermal Oxidizer (RTO) associated with the Hammermill Shredding System shall not exceed the following limits:

i. Natural gas Usage: 6.57 mmscf/month, 52.5 mmscf/year

## iii. Emissions from the combustion of natural gas:

Pollutant	Emission Factor (lbs/mmscf)	Emissions (Tons/Mo)	Emissions (Tons/Yr)
Carbon Monoxide (CO)	1.500-43	15,023.48	
Nitrogen Oxides (NO <sub>x</sub> )	100.0	0.28	2.3728
Particulate Matter (PM)	7.6	0.02	0.20
Sulfur Dioxide (SO <sub>2</sub> )	0.6	0.01	0.02
Volatile Organic Material (VOM)	5.5	0.02	0.14

These limits are based on the maximum firing rate of the RTO burner (15.0 mmBtu/hour), maximum natural gas usage, approximately 1% (12,840 tons/year) of uncontrolled VOM emissions being emitted as CO emissions due to incomplete combustion, and standard emission factors (Tables 1.4-1 and 1.4-2, AP-42, Fifth Edition, Volume I, Supplement D, July 1998).

## c. Emissions from and operation of the Ferrous Material Separation Process shall not exceed the following limits:

## i. Filterable Particulate Matter Emissions

a. PM<sub>10</sub>, PM<sub>2.5</sub>, and PM<sub>1.0</sub> emissions:

Emission Unit	Process Rate		Emission Factor (lb/Ton)	Emissions	
	(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)
592 Conveyor Transfer Points	4,046,440	40,464,440	0.00014	0.08	0.88
	1,444,050	14,440,500		0.10	0.96
3 Truck-Railcar & Barge Loading Points	474,000	4,740,000	0.000264	0.05	0.48
7 Stockpile Loading Points	137,600	1,376,000		0.01	0.14
	300,000	3,000,000	0.000122	0.18	1.83
			varies		
				Total:	2.83
					2.93

b. PM<sub>10</sub> emissions:

Emission Unit	Process Rate		Emission Factor (lb/Ton)	PM <sub>10</sub> Emissions	
	(Tons/Mo)	(Tons/Yr)		(Tons/Mo)	(Tons/Yr)
59 Conveyor Transfer Points	1,444,050	14,440,500	0.000046	0.03	0.31
3 Truck & Barge Loading Points	137,600	1,376,000	0.0001	0.01	0.07
7 Stockpile Loading Points	300,000	3,000,000	Varies	0.09	0.87
				Total:	1.25

c. PM<sub>2.5</sub> Emissions:

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emission Factor (lb/Ton)	PM <sub>10</sub> Emissions (Tons/Mo)	PM <sub>10</sub> Emissions (Tons/Yr)
59 Conveyor Transfer Points	1,444,050	14,440,500	0.000013	0.01	0.09
3 Truck & Barge Loading Points	137,600	1,376,000	0.000015	0.01	0.01
7 Stockpile Loading Points	300,000	3,000,000	Varies	0.01	0.13
			Total:	0.23	

The above filterable PM/PM<sub>10</sub>/PM<sub>2.5</sub> limits are based upon maximum material throughput, Standard emission factors from AP-42 (Table 11.19.2-2, Fifth Edition, Volume I, Update 2004, August 2004) for conveyor transfer points and Truck/Barge Loading, stockpile loadings emission factor derived using AP-42, Section 13.2.4.3 (Table 13.2.4, AP-42, Fifth Edition, Volume I, November 2006) using coefficients of K=0.74 (PM), K=0.35 (PM<sub>10</sub>), and K=0.053 (PM<sub>2.5</sub>); U (mean windspeed) = 9.0 mph, and M (minimum moisture content) = 1.5% applied to light material stockpile, 5.4% applied to raw scrap metal handling, 10% applied to ASR stockpile loading.

- ii. Combined HAP emissions from Ferrous Material Separation Process shall not exceed the following limits:

Emission Unit	Combined HAPs (Tons/Mo) (Tons/Yr)	
Ferrous Material Separation Process	0.01	0.030-04

These limits are based upon metal HAPs being 0.49%-3% of the total PM emissions measured at the discharge of existing non-metal filtering devices (ASR and metal separation unit of General Mill).

- d. Emissions from and operation of the Non-Ferrous Material Separation Process and Fines Processing System shall not exceed the following limits:

- i. Filterable PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions for sources inside building controlled by a baghouse shall be limited to 0.15 tons/month and 1.44 tons/year\*.

**Commented [R12]:** The baghouse PM emission calculations, as described, are completely independent of the number of emission points or the total material throughput.

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emissions		
			Emission Factor (lb/Ton)	PM <sub>10</sub> Emissions (Tons/Mo)	PM <sub>10</sub> Emissions (Tons/Yr)
34-Conveyor Transfer Points Process (Non-controlled)	110,624	1,106,244	0.000300	0.33	3.66
35-Conveyor Transfer Points Process (Controlled)	43,436	434,364	0.00014	0.01	0.01

8-Screening Points Uncontrolled	3,600	38,704	0.02500	0.94	0.36
9-Screening Points Controlled	4,844	53,404	0.00220	0.41	0.02
10-Stockpile Loading Points	638	6,984	0.00364	0.01	0.01
				Total:	1.392

- \* These sources located inside building exhaust to the atmosphere through Dust Collector DC-01, emissions may be calculated by using the stack flow rate (12,000 cfm) and grain loading of 0.005 gr/dscf and hours of operation 4,000 hours/year.

The following are listed upon outdoor uncontrolled through戶排气源頭  
10-Stockpile Loading Points (Uncontrolled) - This source is uncontrolled because it is located outside of the facility building. It is located near the conveyor belt system for grain loading. The source is located in the open air, no building or roof is present above the source. The source is located in the open air, no building or roof is present above the source. The source is located in the open air, no building or roof is present above the source. The source is located in the open air, no building or roof is present above the source. The source is located in the open air, no building or roof is present above the source. The source is located in the open air, no building or roof is present above the source.

ii. Filterable Particulate Matter Emissions PM<sub>10</sub>, PM<sub>2.5</sub>, PM<sub>4</sub>, PM<sub>10-2.5</sub> emissions from outdoor emission units

a. PM emissions from outdoor emission units:

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emission Factor (lb/Ton)	PM <sub>10</sub> -PM <sub>2.5</sub> Emission (Tons/Mo)	PM <sub>10</sub> -PM <sub>2.5</sub> Emission (Tons/Yr)
8-Screening Points (Uncontrolled)	316,368	3,779,832	0.00300	0.94	0.36
11 Conveyor Transfer Points (Controlled)	338,876	3,338,797	0.00014	0.43	0.34
13 Screening Points (Uncontrolled)	57,210	572,103	0.02500	0.17	0.04
12 Screening Points (Controlled)	13,670	136,702	0.02500	0.17	1.71
2 Truck Loading Points	42,209	422,085	0.00220	0.04	0.41
2 Truck Loading Points	26,003	260,032	0.000204	0.01	0.03
13 Stockpile Loading Points	45,847	458,466	Varies	0.05	0.05
13 Stockpile Loading Points	28,643	280,726	0.00364	0.038	0.365
13 Stockpile Loading Points	23,338	233,378	Varies	Total:	1.41

b. PM<sub>2.5</sub> emissions from outdoor emission units:

Emission Unit	Process Rate (Tons/Mo)	Process Rate (Tons/Yr)	Emission Factor (lb/Ton)	PM <sub>2.5</sub> Emission (Tons/Mo)	PM <sub>2.5</sub> Emission (Tons/Yr)
8-Screening Points (Uncontrolled)	316,368	3,779,832	0.00300	0.94	0.36

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<u>88 Conveyor Transfer Points (Uncontrolled)</u>	338,876	3,338,757	0.00011	0.15	1.59
<u>11 Conveyor Transfer Points (Controlled)</u>	57,210	572,103	0.000046	0.01	0.01
<u>13 Screening Points (Uncontrolled)</u>	13,670	136,702	0.0007	0.06	0.68
<u>12 Screening Points (Controlled)</u>	42,209	422,085	0.00074	0.01	0.14
<u>2 Truck Loading Points</u>	45,847	458,466	0.00001	0.01	0.02
<u>13 Stockpile Loading Points</u>	23,338	233,378	Varies	0.04	0.41
			Total:	2.77	

c. PM<sub>10</sub> emissions from outdoor emission units:

Emission Unit	Process Rate (Tons/Mo.)	Emission Factor (Tons/Yr.)	Emission Factor (lb/Ton)	PM <sub>10</sub> Emission (Tons/Mo.)	PM <sub>10</sub> Emission (Tons/Yr.)
<u>88 Conveyor Transfer Points (Uncontrolled)</u>	338,876	3,338,757	0.000167	0.02	0.24
<u>11 Conveyor Transfer Points (Controlled)</u>	57,210	572,103	0.000013	0.01	0.01
<u>13 Screening Points (Uncontrolled)</u>	13,670	136,702	0.001317	0.01	0.09
<u>12 Screening Points (Controlled)</u>	42,209	422,085	0.00005	0.01	0.01
<u>2 Truck Loading Points</u>	45,847	458,466	0.000015	0.01	0.01
<u>13 Stockpile Loading Points</u>	23,338	233,378	Varies	0.01	0.06
			Total:	0.42	

The above PM/PM<sub>10</sub>/PM<sub>2.5</sub> limits are based upon maximum material throughput, Standard emission factors from AP-42 (Table 11.19.2-2, Fifth Edition, Volume I, Update 2004, August 2004) for conveyor transfer points screening and Truck Loading, stockpile loading emission factor derived using AP-42, Section 13.2.4.3 (Table 13.2.4, AP-42, Fifth Edition, Volume I, November 2006) using coefficients of K=0.74 (PM), K=0.35 (PM<sub>10</sub>), and PM<sub>2.5</sub> U (mean windspeed) = 9.0 mph, and M (minimum moisture content) = 1.5% applied to light material stockpile loading.

iii. Combined HAPs emissions from Ferrous Material Separation Process shall not exceed the following limits:

Emission Unit	Combined HAPs (Tons/Mo.)	Combined HAPs (Tons/Yr.)

Non-Ferrous Material  
Separation Process      0.01      0.01

These limits are based upon metal HAPs being 0.034% of the total PM emissions, which is the discharge of existing metal handling during some initial emission control, currently, which

This permit is issued pursuant to section 16 of the Non-Ferrous Metal Handling and Processing Facility Emissions Control Program. The permit is issued under the authority of the Minnesota Pollution Control Agency and does not exceed annual emission rates of 0.01 mg/min. for SO<sub>2</sub>, NO<sub>x</sub>, and PM<sub>10</sub>.

- §6. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

**Commented [R13]:** These emission points described in this condition consist of: C01 (conv.) discharge to shredder feed chute; Shredder discharge to E05 vibratory conv.; E05 vibratory Conv. discharge to C001; C001 discharge to C002; and, C002 discharge to Poker Picker stockpile(s).

These emission points are included in the Ferrous Material Handling System PM emissions